Attachment 4 Site Level Audit Checklist Records

| Site Level OSH Programs | | Date: 04/07/08 | Audi | tor: R. S | elvey | | |
|---|--|---|--|----------------------|----------------------|-----|-------------------|
| Element: 4.3.1 | Title: Planning For Hazard I | dentification, Risk Assessment | and Risk C | ontrol | | | |
| identification of hazards, risk assessidentification and risk assessment is having access to the workplace (inc factors; d.) identified hazards origing persons under the control of the original work-related activities under the converted by the organization materials; h.) modifications to the coperations, processes, and activitie controls; j.) the design of work area organization, including their adopt. The organization's methodology for nature and timing to ensure it is prodocumentation of risks and the imp. For the management of change, the in the organization, the OH&S man The organization shall ensure the row When determining controls, or contaccording to the following hierarch administrative controls; e.) personal The organization shall document accontrols up-to-date. | organization shall establish, implement and massments, and determination of necessary control shall take into account: a.) routine and non-rous cluding contractors and visitors);c.) human behali take into account: a.) routine and non-rous cluding contractors and visitors);c.) human behali nation outside the workplace capable of advers ganization within the workplace; e.) hazards creomtrol of the organization; f.) infrastructure, equon or others; g.) changes or proposed changes OH&S management system, including temporants; i.) any legal obligations relating to risk assess, processes, installations, machinery/equipment to human capabilities. In hazard identification and risk assessment shalo active rather than reactive; b.) provide for the lementation of controls, as appropriate. It organization shall identify the OH&S hazards agament system, or its activities, prior to introdustation of the assessments are considered when sidering changes to existing controls, considerative all elimination; b.) substitution; c.) engineed all protective equipment. In the OH&S risks and determined controls are tall the OH&S risks and the other tall the OH&S risks and the other tal | aintain procedure(s) for the ongal measures. These procedure(s) tine activities; b.) activities of an avior, capabilities and other hursely affecting the health and safecated in the vicinity of the workpuipment and materials at the woin the organization, its activities ry changes, and their impacts on syments and implementation of rent, operating procedures and world the company of the control of the control of the control of the control of such changes. It is also be defined with respect to the identification, prioritization and the and OH&S risks associated with duction of such changes. In determining controls. In determining controls attion shall be given to reducing the ring controls; d.) signage/warms and controls; d.) signage/warms. | oing for hazard ll personnel man ty of lace by rkplace, s or hecessary ork its scope, d h changes the risks ing and/or nined | Major Non-Compliance | Minor Non-Compliance | OFI | Meets Requirement |
| 1. Does the site have written procontrol? Are they up-to-date. Observed State: The newly is developed (01/2008) and was | ocedure[s] that address Planning For Hazard are and cover current scope of operations? ssued OHSAS 18001 Program Subject Area additional to describe the program line organization. | dressed this topic. It was recentlions currently use to implement | y OHSAS. | | | | \boxtimes |
| dated to cover the scope of the Observed State: The site's ris the start on work on remediat added in 2006 and the progra | sk have not elevated or reduced in FY07-08. The ion projects which have the potential to increase in is maturing as documentation transitions from strom Nuclear to Radiological, but this has not | he Emergency Planning Office i e the risks on site. Nanomateria n interim to permanent status. E | s tracking als was | | | | |
| 3. Do the site level procedure[s] substitution; c.) engineering equipment. Observed State: The individual Controls is followed in: Work Radiological Control Manual Manual; and the Exhaust Ven However: • The site level OHSAS Is "hierarchy of controls". • Respiratory Protection is state: "The assessment in the need for respiratory should be added [OFI] • The Hazard Analysis Sunierarchy in choice of in Several operation specific Working with Chemical Magnetic Fields; and R. | al subject areas on hazard/risk control address in Planning and Control, Section 3; PPE Subject I, Chapter 3; Interim 2006-001 Approach to Nantilation Subject Area does not mention this topic to Text should be added. [Minor NC] Subject Area does not state that respirators are I must first evaluate feasible engineering and adaptive for Areas of Administrative Controls in plementation. Text should be added [OFI] its Subject Areas refer to controls and PPE with specific Subject Areas refer to controls and PPE with specific Subject Areas refer to controls and PPE with specific Subject Areas refer to controls and PPE with specific Subject Areas refer to controls and PPE with specific Subject Areas refer to controls and PPE with specific Subject Areas refer to controls and PPE with specific Subject Areas refer to controls and PPE with specific Subject Areas Refety; Lead; Noise of F/Microwave Subject Areas. Text should be added. | this element as appropriate. Hie tarea Handbook Introduction; nomaterials ESH; ISO 14001 Plausing the exact words and intent last in a Hierarchy of Controls. In ministrative controls that could be yof Controls is not specifically and Design features but does not not a hierarchy statement, included [OFI] | or the term t does climinate stated. Text t mention a ding: | | | | |
| 4. Do the site level procedure[s, access to the workplace (included); d.) identified hazards original under the control of the organized activities under the cowhether provided by the organized | I address a.) routine and non-routine activities, uding contractors and visitors); c.) human behavation outside the workplace capable of adversel nization within the workplace; e.) hazards create outrol of the organization; f.) infrastructure, equinization or others; g.) changes or proposed choot the OH&S management system, including tem | ;b.) activities of all personnel havior, capabilities and other hum by affecting the health and safety ed in the vicinity of the workplace wipment and materials at the wor winges in the organization, its act | an factors of persons ee by work- rkplace, ivities or | | | | |

| operations, processes, and activities; i.) any legal obligations relating to risk assessments and implementation of | | |
|---|--|--|
| necessary controls; j.) the design of work areas, processes, installations, machinery/equipment, operating procedures | | |
| and work organization, including their adoption to human capabilities. | | |
| Observed State: BNL has requirements in Subject areas for those activities done by others such as Asbestos, | | |
| Construction, Confined Spaces, Diving, Engineering Design, and Work Planning and Control. More details are found | | |
| in PE ES&H 500 Project Environmental Safety and Health Review | | |

PROCEDURES AND DOCUMENTATION REVIEWED:

- Subject Areas: Asbestos; Construction; Confined Spaces; Diving; Engineering Design; Exhaust Ventilation; Working with Chemicals; Electrical Safety; Laser Safety; Lead; Noise and Hearing Conservation; OHSAS 18001 Program; Static Magnetic Fields; RF/Microwave; Work Planning and Control
- Radiological Control Manual
- Interim 2006-001 Approach to Nanomaterials ESH
- ISO 14001 Plus EMS Manual.

Site Level OSH Program

Element: **4.4.4**

• PE ES&H 500 Project Environmental, Safety, and Health Review Rev9, 03/16/06

COMMENTS:

FINDING:

- The site level *OHSAS 18001 Subject A*rea does not use the exact words of "hierarchy of controls' and express the exact intent of this element. [Minor NC]
- The Subject Areas Respiratory Protection; Hazard Analysis; Working with Chemicals; Electrical Safety; Laser Safety; Lead; Noise and Hearing Conservation; Static Magnetic Fields; and RF/Microwave have vague wording on Hierarchy of Control and could be improved with more specific wording [OFI]

| Site Level OSH Program | | Date: 04/07/08 | Audi | tor: R. S | elvey | | |
|---|--|---|--|----------------------|----------------------|-------------|-------------------|
| Element: 4.3.3 | Title: C | Objectives and program(s) | | | - | | |
| OHSAS 18001 STANDARD: The organization shall establish, implement and maintain documented OH&S objectives, at relevant functions and levels within the organization. Objectives shall be measurable, where practicable, and consistent with the OH&S policy, including the commitments to the prevention of injury and ill health, to compliance and other requirements to which the organization subscribes, and to continual improvement. When establishing and reviewing its objectives, an organization shall take into account the legal requirements and other requirements to which the organization subscribes, and its OSH risks. It shall also consider its technological options, its financial, operational and business requirements, and the views of interested parties. The organization shall establish, implement, and maintain a program[s] for achieving its objectives. Program[s] shall include at a minimum: a.) designation of responsibilities and authority for achieving objectives at relevant functions and levels of organizations; and b.) the means and time frame by which the objectives are to be achieved. The program[s] shall be reviewed at regular and planned intervals and adjusted as necessary, to ensure that the objectives are achieved. | | | | Major Non-Compliance | Minor Non-Compliance | OFI | Meets Requirement |
| Observed State: Site level Obhave not been updated. Are they reviewed and approvious Observed State: Site level OS | SH Objectives were prepared, reviewed with the te. They were made available to line organizati | e line organizations, finalized ((| 08/29/07), | | | | |
| commitments to the prevention organization subscribes, and Observed State: The suggested use by the line organizations. | le, where practicable? Are they consistent with on of injury and ill health, to compliance and of to continual improvement? ed target section was specifically designed in FY Each objective has term such as "number of heactives avoided the "done/not done" measure as | other requirements to which the Y08 to include quantifiable measurs/per month", "%completed" | e asures for ', number of | | | | |
| 3. Has BNL established and is it designation of responsibilitie organizations; and b.) the m. Observed State: The site leve implemented mostly by line o objective and were to implementel level to track the progress by OSH Management Review (i. year has ended. | it implementing a program[s] for achieving its is and authority for achieving objectives at relevant and time frame by which the objectives at el objectives were not assigned a champion. The reganizations or SHSD program owners. Tracking ent it at a line organization level. It would be but the line organizations towards meeting the site see, status is determined), but the current process | objectives. Does it include a.) evant functions and levels of re to be achieved. e site level Objectives were me ing was left to those who select- etter to assign a "champion" at goals. This actions occurs at th | ant to be ed an the site e Site Level | | | \boxtimes | |
| FY2008 ESH Objectives andOHS Management Reviews - | OHS Management Reviews - BNL Site Level 2007 OHSAS 18001 Program Subject Area | | | | | | |
| FINDING: OFI: Assign a champion to site OS | SH Objectives. | | | | | | |

Date: 04/07/08

Title: Documentation

Auditor: R. Selvey

| OHSAS 18001 STANDARD: The OH&S management system documentation shall include: a.) the OH&S Policy and objectives; b.) description of the scope pf the OH&S management system; c.) description of the main elements of the OH&S management system and their interactions, and reference to related documents; d.) documents, including records, required by this OHSAS Standard; and e.) documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risks. | Major Non- Compliance | Minor Non- Compliance | OFI | Meets Requirement |
|--|--------------------------|--------------------------|-----|----------------------|
| 1. Does the site maintain OH&S management system documentation for the following? Record location of the document/record: | | | | |
| ☑ <i>OH&S Policy</i> Described at the Site level in a document approved by the Laboratory Director. Dated 09/06/2006. It describes current operations and policy. | | | | |
| ☑ <i>Objectives</i> Developed at the Site level by Site's OHSAS Project Manager, so serve as a starting point for line organization and SHSD program owners to deploy. Accessible for line organizations to develop their own Objectives for applicable issues that they plan to address in the upcoming year. | | | | |
| ☑ Description of the scope pf the OH&S management system Prepared at the site level within the new OHSAS 18001 Subject Area as Exhibit: BNL's OHSAS 18001 Program Scope. It is formatted per the OHSAS 18001 elements so that all topics are covered. It links to existing Subject Areas and other program documentation rather than repeating it in the OHASAS 18001 Subject Area. | | | | |
| ☑ Description of the main elements of the OH&S management system and their interactions, and reference to related documents Described at the Site level within the new OHSAS 18001 Subject Area or linked subject area documents from that main subject area. | | | | |
| Developed and Controlled at the Site level by Site's OHSAS Project Manager in Building 120, Room 1-22. Files are examined and are maintained under control. | | | | |
| Documents & records necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risk Site level risk assessments are prepared. They are controlled at the Site level by Site's OHSAS Project Manager for the seven site JRAs and two FRAs. Kept in Building 120, Room 1-22. | | | | \boxtimes |
| PROCEDURES AND DOCUMENTATION REVIEWED: BNL site level OSH Web Site Environmental, Safety, Security, and Health Policy Site JRAs [doc]: Bicycling; Driving; Electrical Safety; Manual Material Handling; Office Work; Travel; Walking Site FRAs [doc]: Natural Hazards in the Environment; Research Support Building OHSAS 18001 Program Subject Area COMMENTS: | | | | |
| FINDING: none | | | | |

| Site Level OSH Program | | Date: 04/07/08 | Audi | tor: R. Se | elvey | | |
|--|---|---|-----------------------------------|------------|----------------------|-----|-------------------|
| Element: 4.4.5 | Title: | Control of Documents | | | | | |
| OHSAS 18001 STANDARD: Documents required by the OH&S management system and by this OHSAS Standard shall be controlled. Records are a special type of document and shall be controlled in accordance with the requirements given in 4.5.4. The organization shall establish, implement and maintain procedure[s] to: a) approve documents for adequacy prior to use; b) review and update as necessary and re-approve documents; c) ensure that changes and the current revisions status of documents are identified; d.) ensure that relevant versions of applicable documents are available at points of use; e.) ensure that documents remain legible and readily identifiable; f.) ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the OH&S management system are identified and their distribution controlled, and g.) prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose. | | | | | Minor Non-Compliance | OFI | Meets Requirement |
| to use and reviews, update as Observed State: This requirer the final stages of approval an OH&S Policy: Controlled at t Objectives: Controlled at the Description of the scope of th Program Subject Area by the Controlled at the Site level by are maintained under control. | the Site level by the ALD for Ash's Office. Site level by Site's OHSAS Project Manager. The OH&S management system: Controlled at the | ntrol Document Subject Area control | urrently in | | | | |
| revisions status of documents that reviews changes.) Observed State: This requiren stages of approval and posting The current Internal Control I the text marking to appear in t | In place requiring the site and organizations to a re identified? (example: track changes, margement is within the draft Internal Control Documer. That subject is not approved at the time of the Document Subject Area has the following stater the posted version: For ease of review, a proposition the margin or by highlighted text). When several the posted version is the posted version or by highlighted text. | ent subject Area currently in the ent subject Area currently in the Audit. nent as guidance which does not seed revision to a document show | ocument e final ot require uld be | | \boxtimes | | |

| | document, some method of tracking should be used. The Document Rev | view Tracking Sheet provides a sugge | sted form. | | | | |
|--|---|---|--------------|--------------------------|--------------------------|----------|-------------|
| 3. | Does BNL make site level documents are available at points of use? Observed State: ESSH Policy, Subject Areas, site FRAs, site JRAs, and | | | | | | \boxtimes |
| 4. | available via the internal BNL web pages. Does BNL have procedures in place requiring the site and organization and readily identifiable? | ons to ensure that documents remain | ı legible | | | | |
| | Observed State: This requirement needs to be added to the draft <i>Interna</i> the final stages of approval and posting. [Minor NC] | al Control Document Subject Area cu | rrently in | | | | |
| 5. | Do site level documents have document control identification? Observed State: | | | | | | |
| | All FRAs and JRAs had document form numbers and Revision Dates. The <i>OHSAS 18001Program</i> Subject Area has Revision Date and revisi Site Environmental, Safety, Security, and Health Policy has a revision of the control | | | | | | |
| 6. | Are site level OH&S documents external origin identified and their d | | | | | | |
| | Observed State: SHSD maintains and controls distribution of the external originated OS Management files of the Safety Engineering and Industrial Hygiene Gr | SH program documents in the Require | ements | | | | |
| 7. | Does the site level prevent obsolete document from unintended use of are retained for any purpose. | | them if they | | | | |
| | Observed State: | | | | | | |
| | SHSD uses an "obsolete" stamp on documents of external origin on the historical purposes. The "obsolete" stamp is used on the site level OSH | | | | | | |
| | older retained for reference. All active documents with web distribution are controlled by removing | out-of-date versions from the web. | | | | | |
| | OSH Forms and fill-in documents have form numbers: | , | | | | | |
| | Industrial Hygiene Self Assessment Guidance Cards have form no OSH Internal Audit Checklists have form numbers. | imbers. | | | | | |
| | • FRA and JRA forms have form dates and revision numbers. | | | | | | |
| | Emergency Preparedness and Response drill forms have revision | numbers (no date). | | | | | |
| PRC | CEDURES AND DOCUMENTATION REVIEWED: | | | l | l | | l |
| • | BNL Site Level JRA/FRA Guidance to Hazards and Controls from the | site OSH web site. | | | | | |
| • | Environmental, Safety, Security, and Health Policy. | | | | | | |
| • | ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~ | | | | | | |
| • | | | | | | | |
| • | Internal Control Documents Subject Area. OHSAS 18001 Program Subject Area. | | | | | | |
| COL | MMENTS: | | | | | | |
| | DING: | | | | | | |
| | or NC: The Internal Control Document Subject Area in the 2006 version ized, approved, and posted on the SBMS web. | is missing some elements needed for | OHSAS. Th | e 2008 d | lraft need | ls to be | |
| Site | Level OSH Program | Date: 04/07/08 | Audi | tor: R. S | elvey | | |
| | nent: 4.4.6 | Title: Operational Control | | | | | |
| OHS | AS 18001 STANDARD: The organization shall determine those open | • | ted with | | | | |
| iden | tified hazard(s) where the implementation of controls is necessary to ma | | | | | | × |
| | agement of change. | | | ე ჳ | ე ₹ | | Meets |
| | those operations and activities, the organization shall implement and mo | | | Major Non- Compliance | Minor Non- Compliance | OFI | Re |
| | rganization and its activities; the organization shall integrate those ope agement system; b.) controls related to purchased goods, equipment and | | | liar | liar | FI | Requirement |
| | r visitors to the workplace; d.) documented procedures, to cover situatio | | | n- |)n- | | em |
| fron | the OH&S policy and the objectives; e.) stipulated operating criteria w | | | | | | ent |
| | OSH policy and the objectives. | | | | | | |
| 1. | Does BNL have site level program[s] to implement: | ctivities the organization shall into | rata thosa | | | | |
| | a) operational controls, as applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system; | | | | | | |
| b.) controls related to purchased goods, equipment and services; | | | | | | | |
| c.) controls related to contractors and other visitors to the workplace; | | | | | | | |
| Observed State: | | | | | | | |
| Work Planning and Control for Experiments and Operations Subject Area is the main driver for procedures to cover | | | | | IШ | | |
| | | irea is the main arriver for procedures | | | | | |
| | this element. ES&H hazards are also identified in facility design via <u>PE ES&H 500 I</u> | • | <u>ealth</u> | | | | |
| | this element. | Project Environmental, Safety, and H | | | | | |
| | this element. ES&H hazards are also identified in facility design via <u>PE ES&H 500 I Review</u> . | Project Environmental, Safety, and Houses of PPE items of high consequence quirements provides a graded approar | e. | | | | |

| Attachment 4 | | | | J | | | |
|--|--|---|---|----------------------|----------------------|-----|-------------------|
| Observed State: The OHSAS 18001 Program Assessments when change of facility; As part of the comm that affect the risk; and in co- conformance associated with The current Internal Control elements. The draft 2008 rev | Document subject area requires reviews vision of Internal Control Document sub | g, and/or updating Job or Facility Risk effect current jobs and/or conditions at ning new operations or when operation s, critique, occurrence, near miss, or O | site or s change SH non- | | | | |
| Project Management Subject Purchase Requisition Review Work Planning and Control OHSAS 18001 Program Sub COMMENTS: FINDING: | Area Subject Area Subject Area Subject Area conmental, Safety, and Health Review 3/1 t Area of for Quality-related Requirements Subject for Experiments and Operations Subject ject Area | ect Area Area | | | | | |
| Note: The draft status of the 2008 | revision of Internal Control Document h | has been noted in earlier findings. It is | not repeated h | ere. | | | |
| Site Level OSH Program | | Date: 04/07/08 | Aud | tor: R. S | elvey | | |
| Element: 4.5.3 | Title: Incident investig | ations, Nonconformity, Corrective a | nd Preventive | Action | | | |
| investigate and analyze incidents is causing or contributing to the occur for preventative action; d.) identify investigations. The investigations opportunities for preventative activity investigation shall be documented 4.5.3.2 Nonconformity, Corrective maintain a procedure(s) for dealin preventative actions. The procedutracking action(s) to mitigate their taking actions in order to avoid the implanting appropriate actions decorrective actions(s) and preventative actions(s) taken. Where the corrective action and procedure shall requiremplementation. Any corrective action or preventat appropriate to the magnitude of procedure that made to the OH&S management signals. | e Action, and Preventative Action: The or ng with actual and potential nonconforming ure(s) shall define requirements for: a.) in r OH&S consequence; b.) investigating no e recurrence; c.) evaluating the need for signed to avoid their occurrence; d.) recuive actions(s) taken; and e.) reviewing to reventative action identifies new or changing that the proposed actions shall be taken tive action taken to eliminate the causes of the reventative action taken to action the the offi- trans and commensurate with the OH of the tay necessary changes arising from the tystem documentation. | A&S deficiencies and other factors that all for corrective actions; c.) identify opposit; d.) communicate the results of such Any identified need for corrective actions are relevant parts of 5.4.3.2. The results of such a relevant parts of 5.4.3.2. The results of such a relevant parts of 5.4.3.2. The results of such a relevant parts of 5.4.3.2. The results of the such and for taking corrective actions and dentifying and correcting nonconformity (ies), determining their contains and communicating the results of the effectiveness of corrective action(s) are defined as a risk assessment prior to the factual or potential nonconformity (iew. & S risk(s) encountered. | might be cortunities on or of incident and ty(ies) and ause(s) and of and and sylvand | Major Non-Compliance | Minor Non-Compliance | OFI | Meets Requirement |
| Observed State: | edure(s) for record, investigate and and of Incidents, Accidents, and Injuries addr | | | | | | \boxtimes |
| 2. Is it effective to a.) determine underlying OH&S a incidents; b.) identify the need for corrective c.) identify opportunities for preved.) identify opportunities for conta e.) communicate the results of such Observed State: Event/Issues Management Statermining Significance Ca establish chronology; Analyz Condition/Cause and Develo The Investigation of Incident Investigating and Reporting; Analysis. There are four for | deficiencies and other factors that migh e actions; entative action; inual improvement; | sponse to the Event, calling the Catego ogather relevant documents; collate fall analysis; following up on actions and entive Actions. has sections on: Investigation Coordinaty; Close-Out/Lessons Learned; and Trecompleting investigations. | rizer; lects, and Extent of tion; ending and | | | | |

Management Council, annual causal analysis data given to the Management Council; data entered into the DOE Computerized Accident Incident Investigation Reporting System (CAIRS); and written Lessons learned results from the

incident. This subject area has no requirements on the distribution of reports from investigation. [OFI]

FINDING: none

| 3. | Observed State: An interview with the site Incident Investigator SME indicated All accident investigations in FY08 were conducted at the line organization level. There were no site level accident investigations. Corrective Actions for ESH issues were tracked in the Assessment tracking system (ATS) at the site level and at the line organization level (Family ATS). This system adequately notifies action owners of the status of their actions, and allows management to track status and approve or deny closure of actions from the system. In FY07 and 08, the ESH ALD began aggressively requiring electronic documentation proof to be attached to the closure requests. This will make future investigations on the appropriateness and effectiveness of closure action to be better measured. | | | | | × |
|----------------------|---|---------|----------|----------|--------|-------------------|
| 4. | Were site level corrective actions or opportunities for preventative action determined? Observed State: n/a | | | | | \boxtimes |
| 5. | How were the results of site level incident investigation documented and maintained? | | | | | \boxtimes |
| | Observed State: n/a COCEDURES AND DOCUMENTATION REVIEWED: | | | | | |
| Sub Sub Inte | bject Area: Investigation of Incidents, Accidents, and Injuries; 07/11/05 bject Area: Event/Issues Management; 09/28/06. bject Area: Nonconformances, Identifying and Reporting, 12/15/2003. terview with S. Kane, SHSD Safety Engineering Manager. terview with J. Ellerkamp, Investigation of Incidents, Accidents, and Injuries SME. | | | | | |
| | DMMENTS: NDING: | | | | | |
| The | the Investigation of Incidents, Accidents, and Injuries Subject Area has no requirements on the distribution of reports frould be improved if specific details were described. [OFI] | m inves | stigatio | n. The d | ocumen | i . |
| | Site Level OSH Program Date: 04/07/08 Audito | | | | | |
| Elei | ement: 4.5.4 Title: Control of Records | | | | | |
| to th The rete | OHSAS 18001 STANDARD: The organization shall establish and maintain records as necessary to demonstrate conformity to the requirements of its OH&S management system and of this OHSAS Standard, and the results achieved. The organization shall establish, implement and maintain a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records. Records shall be and remain legible, identifiable and traceable. 1. Does BNL implement procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records? Observed State: | | | | | Meets Requirement |
| | The Subject Area <i>Records Management</i> covers the requirements of this element. It covers the requirements of this element. | | П | | | |
| 2. | Are site OSH records legible, identifiable and traceable. Are the records stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss? (Evaluate at least three record locations/owners) Observed State: The Site Hazard and Controls List has a revision date and number. The site OSH Objectives have a revision date. Health & Safety Record/Document Management Requirements have a revision number and date. Site level Internal Audit has a record date. | e | | | | |
| | The site level OSH Management Review has a record date. All records on the OSH web page had a revision date or number. Location: OHSAS 18001 site Records: Building 120, Room 1-022 HP80.7 file cabinet and NSF Binder. Location: BNL site OSH Web Site http://www.bnl.gov/esh/shsd/ohsas/default.asp Location: SBMS Web Site https://sbms.bnl.gov/default.cfm Location: | | | | | |
| • | BNL Site Level JRA/FRA Guidance to Hazards and Controls, Rev 1, 12/05/07. Site ESH Objectives 2008. Health & Safety Record/Document Management Requirements. Internal Audit 2007. 2008 OSH Management Review. Subject Area: Records Management. OSH Management Representatives list, Final Rev15, 10/31/07. Pamphlet on Key OHSAS Principles, 05/10/07. OHSAS 18001 Primer, Rev0 07/12/06. | | | | | |

Attachment 5 Line Organization Checklist Records

Basic Energy Science Directorate

| Organization: BES- CFN | | Date: 3-11-08 | Auditor: J | . Taylor/ | W. Litz | ke | |
|--|--|--|--|----------------------|----------------------|-----|-------------------|
| Element: 4.3.1 Title: Planning For Hazard Identification, Risk Assessment and Risk C | | | | | | | |
| identification of hazards, risk assesidentification and risk assessment. The organization's methodology for nature and timing to ensure it is prodocumentation of risks and the imp. For the management of change, the in the organization, the OH&S may the organization shall ensure the without the organization of the following hierarch. The organization shall document a controls up-to-date. The organization shall ensure that implementing and maintaining its | nd keep the results of the identification of hazar the OH&S risks and determined controls are ta OH&S management system. | I measures. These procedure(s) Il: a.) be defined with respect to identification, prioritization an and OH&S risks associated wi duction of such changes. In determining controls. Ition shall be given to reducing ords, risk assessments, and deternition account when establish | for hazard o its scope, d th changes the risks nined | Major Non-Compliance | Minor Non-Compliance | OFI | Meets Requirement |
| sBMS OHSAS 18001 Progr non-routine activities; b.) act visitors);c.) human behavior, workplace capable of advers the workplace; e.) hazards or organization; f.) infrastructu others; g.) changes or propo- management system ,includin legal obligations relating to processes, installations, mach to human capabilities. Observed State: The primary Standard Operating Procedur Administration Program for a Awareness (COSA), Safety P plant maintenance and contra- major equipment by contract | methodology of documenting risk assessment of the arm? _X_No _Yes. If Yes, does the softivities of all personnel having access to the work capabilities and other human factors; d.) identified affecting the health and safety of persons undereated in the vicinity of the workplace by work-rare, equipment and materials at the workplace, we seed changes in the organization, its activities or any temporary changes, and their impacts on openisk assessments and implementation of necessary himery/equipment, operating procedures and work mechanism for identifying hazards and control tes, FRA, and JRA documents. The CFN also in graduate students, post-docs and collaborating reaching the students, post-docs and collaborating reaching the students. Work permits are used factor work in laboratories. Work permits have boors during the startup phase of operations. | system take into account: a.) ro- kplace (including contractors a ified hazards origination outsid der the control of the organizat velated activities under the control whether provided by the organiz- materials; h.) modifications to rations, processes, and activitie ry controls; j.) the design of wo ork organization, including their ls is by Experimental Work Plan mplements work control through esearchers- CFN Operational Sa for non-routine activities associ- ieen used extensively for install | nutine and nd e the ion within rol of the aution or the OH&S s; i.) any rk areas, r adoption nning- ESR, n the User offety atted with attion of | | | | |
| non routine activities; all pe. Observed State: As the CFN of experimental activities and CFN OFI 1: There are (18) J team of five members. It is r which these would apply, be | rsonnel and all facilities? It is a new facility all the reviewed risk assessment JRAs quantify risk associated with specific tast IRAs at the CFN that cover a variety of routine a recommended that other staff members both rese involved with the development, review, and or research. | nts are current. ESRs cover the ks. activities, and these were all deverrehers and administrative wor revision of future JRAs. | full scope reloped by a kers to | | | ⊠ | |
| assessments? Were they up- | the organization's facilities or operations that note to dated to cover the scope of the change? have occurred yet because the facility is new and | Ç | ī | | | | \boxtimes |
| d.) signage/warning and/or a within risks assessments and Observed State: The hierarch that they have substituted pure dilutions in the lab. Noteword to fill acid sample vials, to make the control of t | e the hierarchy of controls (i.e.: a.) elimination administrative controls; e.) personal protective et other planning documents? hy of controls was observed in 1L10 lab experim rehased, prediluted hydrofluoric acid for concentry practices observed include the added engine inimize handling of HF; appropriate signage not ty Approval Forms, under the User's program, is given to visiting researchers. SR: NC-2007-10-ELM Safety Approval Forms: SAF # 138 (Jump Start Email to prospective users from CFN User Adminosa (Nanopartterning-Clean Room 735) earba, C.Y. Nam, C. Black | nents. Interview with researche trated forms to eliminate the ne terring control, a bench-top roboted for carcinogen used in the has verified by the User Administration, SAF # 140,\ | r indicated cessity for tic system cod. | | | | \boxtimes |

| | 5. Are operational controls in place and working as specified? Observed State: Operational controls such as operator aids/ procedures, training, and PPE are in place. Noted following specific controls: cryo fill procedure, ODH posting, RGD controls, and nanomaterials controls summary. Document reviewed: Cooldown procedure (1L35) of LakeShore probe station using 60L liq. He dewar or 50 L of LN2 dewar. Researchers have completed all training; PPE were available at the point of use and found to be in good condition. | | | | |
|----|--|-------|---------|-----|-------|
| | 6. What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? Observed State: Work permit is generally used to communicate operational controls, training is provided through contractor, vendor orientation (CVO) NC-09, and this is found to be thoroughly covered. The CFN Operations and Safety Awareness covers the visiting researchers under the User's program. | | | | |
| | PROCEDURES AND DOCUMENTATION REVIEWED: Document reviewed: ESR: NC-2008-17-EM, NC-2008-18-EM, NC-2007-10-ELM Document reviewed: Safety Approval Forms: SAF # 138 (Jump Start), SAF # 140 Document reviewed: CFN Operations and Safety Awareness, COSA (Nanopartterning- Clean Room 735) Document reviewed: Job Training Assessments and their Required Training, ESR and JTA matrix Document reviewed: CFN Work Planning Controls (work permit binder) Staff Interviewed: I. Gearba, C.Y. Nam, C. Black (researchers), A. Piper (bldg. manager), G. Webster (User Administra | tor) | | | |
| | COMMENTS: NOTEWORTHY PRACTICE: Associated procedures are referenced on ESRs cover page. | | | | |
| 1 | FINDING: CFN OFI 1: There are (18) JRAs at the CFN that cover a variety of routine activities, and these were all developed by a team recommended that other staff members both researchers and administrative workers to which these would apply, be involved wand or revision of future JRAs. | | | | ew, |
| Γ. | Occupiestics, DES CMDMSD | T1 | W I :- | 1 | |
| | Organization: BES- CMPMSD Date: 3-19- Auditor: J Element: 4.3.1 Title: Planning For Hazard Identification, Risk Assessment and Risk C | | W. LILZ | ке | |
| | Title. I faining Pol Hazard Identification, Risk Assessment and Risk C | | | | |
| | Audit question | Major | Minor | OFI | Meets |
| | Does the organization use a methodology of documenting risk assessment and control other than that described in SBMS OHSAS 18001 Program? _X No Yes. Observed State: The primary mechanism for identifying hazards and controls is by Experimental Work Planning- ESR, Standard Operating Procedures, FRA, and JRA documents. Work permits are used for non-routine activities associated with plant maintenance and contractor work in laboratories. Work permits may also be used to identify hazards and controls for work in machine shops. | | | | |
| | 2. Are the line organizations Risk Assessments up-to-date? Do they cover current full scope of operations; routine and non routine activities; all personnel and all facilities? Observed State: New Employee/Guest Orientation and Training Requirements under Work Planning dated 8/23/06. There are (18) JRAs at the CMPMSD that cover a variety of routine activities; these were all up-to-date and cover the full scope of current operations. CMPMS OFI 1: For the NEO form, update Training Requirements to include CFN's facility-specific requirements | | | | |
| | under "Location Specific Training," as researchers may collaborate between the two departments. 3. Have changes occurred in the organization's facilities or operations that necessitated a change in the risk assessments? Were they updated to cover the scope of the change? Observed State: Current risk assessments cover the scope of operations. One of the more recent changes to an experiment includes the installation of a new 14T superconducting magnet; associated hazard identification, risk assessment, and training are thoroughly covered in ESR-70, and MA-JRA-027. The ESR was revised to address the new equipment; the JRA did not require revision as it had already appropriately addressed the risks. | | | | |
| | 4. Did the organization observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Observed State: The hierarchy of controls was observed in the machine shop. This is operated under a standing Work Permit that is renewed annually. Interview with technician indicated that the use of specific machines require training and signed authorization. Signage, administrative controls and PPE are used for noise hazards. | | | | |
| | CMPMS OFI 2: Add web training on Noise and Hearing Conservation to JTA for users. Document reviewed: Work Permit for Machine shop, 480-04037a Document reviewed: Training for Specific Machines, Authorization Sign-off sheets Document reviewed: "Acceptance of Responsibility" (agreement by users to comply with safe practices) Staff Interviewed: K. Sutter | | | | |
| - | 5. Are operational controls in place and working as specified? Observed State: Operational controls such as operator aids/ procedures, training, and PPE are in place. Document reviewed: ESR-40 (Lab 1-134), procedure for HF use from SBMS, emergency first aid, PPE were available at the point of use and found to be in good condition. Document reviewed: ESR-15 Interviewed: Qing Jie , A. Gozar, and S. Riggs (collaborator) on PPE used for cryogenics work, training Documents reviewed: ESR-58, Training Record on Crystal Growth Experiment, Procedure Interviewed: Rongwei Hu (student) on web training, training by the PI on operational controls, knowledgeable on lab | | | | |

| hazard postings, PPE for cryogen use. | | | | | | | |
|---|--|-----------|----------|-------------|--|--|--|
| 6. What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? Observed State: Work permit is generally used to communicate operational controls, training is provided through contractor, vendor orientation (CVO) and this is found to be thoroughly covered. Interviewed: Don Tylutki (contractor, JEOL), knowledgeable of electrical safety requirements. | | | | \boxtimes | | | |
| PROCEDURES AND DOCUMENTATION REVIEWED: | | | | | | | |
| Document reviewed: ESR-40 (Lab 1-134), ESR-58 PM2005-077 (Lab W10, 703) | | | | | | | |
| Document reviewed: Work Permit 480-011706B for Lab 1-132 | | | | | | | |
| Document reviewed: CMPMSD New Employee/ Guest Orientation form (8/23/06, rev.0); Training requirements: W | Document reviewed: CMPMSD New Employee/ Guest Orientation form (8/23/06, rev.0); Training requirements: Work Planning requirements | | | | | | |
| (8/23/06 rev.0) | | | | | | | |
| Document reviewed: Job Training Assessments and their Required Training, ESR and JTA matrix | | | | | | | |
| Staff interviewed: A. Bolinger, Gennady Logvenov (Researchers); R. Sabatini (ESH Coord.), R. Hu (grad student) | | | | | | | |
| COMMENTS: | | | | | | | |
| FINDING: | | | | | | | |
| CMPMS OFI 1: For NEO form, update Training Requirements to include CFN's facility-specific requirements under "Location | on Speci | fic Train | ing," as | | | | |
| researchers may collaborate between the two departments. | • | | - | | | | |
| CMPMS OF 12. Add web training on Noise and Hearing Conservation to ITA for users of machine shop | | | | | | | |

| Org | anization: BES- Chemistry | Date: 3-12-08 | Auditor: J. Taylor/ W. Lit | zke | | | |
|------|---|--|--|---------|-------|-------------|-------------|
| Elei | ment: 4.3.1 | Title: Planning For Ha | zard Identification, Risk Assessment and | Risk Co | ntrol | | |
| | | Audit question | | Major | Minor | OFI | Meets |
| 1. | Does the organization use a methodology of de SBMS OHSAS 18001 Program? _X_ No Observed State: The primary mechanism for id Standard Operating Procedures, FRA, and JRA with plant maintenance and contractor work in hazards for lasers, NMR, fluorescence equipme (WCM) and Work Control Coordinator (WCC) The web requisition is a mechanism that initiat a vendor is expected onsite to do work (i.e. reparations). | Yes lentifying hazards and controls documents. Work permits are laboratories. In Chemistry wor ent, and these are found in a bind les notification to the ESH Coord | is by Experimental Work Planning- ESR, used for non-routine activities associated k permits identify, for example, electrical der managed by the work control manager | | | | |
| 2. | Are the line organizations Risk Assessments upon routine activities; all personnel and all far Observed State: ESRs cover the full scope of etasks. Of the (31) JRAs that are active, 1 has reat LEAF, Class 4 lasers). This falls within the reviewed on the 3-yr cycle. There are plans to rofi 1: Based on the BES policy for continual more frequently. A review/update of CO-JRA-(CO-4-9) which was recently last updated in Do | p-to-date? Do they cover curre cilities? experimental activities and JRA: experimental activities and JRA: experimental science JRA Review Pol review this JRA during the next improvement, those that are conditionally as should be planned to incorporate 2007. | s quantify risk associated with specific ch is CO-JRA-3 (Pulse-Pump Probe Exp't icy, that not all (100%) of the JRA are month. Insidered high-risk would be reviewed rate any changes to the associated ESR | | | ⊠ | |
| 3. | Have changes occurred in the organization's j assessments? Were they updated to cover the Observed State: Two FRAs (FRA-01 and FRA operations. Anew experiment with a clean roon to be determined if new JRAs need to be establ Document reviewed: FRA-01, FRA-03 Staff interviewed: D. Cabelli | scope of the change? a-03) were reviewed in 2008 with has been installed in Lab 109; | thin the 3-yr cycle to include changes in | | | | |
| 4. | Did the organization observe the hierarchy of d.) signage/warning and/or administrative cont within risks assessments and other planning d Observed State: The hierarchy of controls was they recognized the hazards of the pressure ves: interlocks applied), proper signage and PPE we specific chemical is the focus, and therefore sul Document reviewed: ESR CO-4-8 (press Document reviewed: ESR CO-4-5 Labs visited: Lab 261 (Laser lab), Lab 10 Staff Interviewed: D. Cabelli, ESH Coor | trols; e.) personal protective equality of the last selection in the last room, integrated and available. Note that the bestitution is not a viable option sure vessel) 19 (PHENIX portable clean room) | Interview with researchers indicated that rated engineering controls (laser t for many Chemistry experiments a for risk reduction. | | | | \boxtimes |
| 5. | Are operational controls in place and working Observed State: Operational controls and best labs, PPE eyewear for laser use, portable monit rubber gloves were being used in an operation of | management practices are in pla ors for leak detection of CO gas | s and test procedures. Safety goggles and | | | | |
| 6. | What is the mechanism to inform contractors/ Observed State: The work permit process and the operational controls in an area. An example is noteworthy to prepare such a hazard assessm as they apply to interested parties is recommended. | FRA ensure that contractors/ rele is the newly developed FRA cent for the facility; however, fu | evant workers are knowledgeable about on working in high noise areas in 555. It rther training and/or review of the controls | | | \boxtimes | |

Attachment 5

| Coordinator involvement. OFI 2: For FRA-09 Other staff members, who may occupy or pass by these areas, should be considered as risk team members to improve the communication of the specific controls identified in the FRA. | | |
|--|--|--|
| | | |

PROCEDURES AND DOCUMENTATION REVIEWED:

- Document reviewed: ESR: CO-4-8 (pressure vessel), PO-PHENIX-3 (new under review by CO)
- Document reviewed: Memo from S. Kane to D. Grills, March 24, 2007 on testing of pressure vessel
- Document reviewed: FRA-01, FRA-03, FRA-09 (Noise)
- Document reviewed: Work Permit CO: 07-555-27, 07-555-29 (work in lab 109), 07-555-31
- Interviewed: M. Doherty on ESR CO-4-1 and CO-4-11

COMMENTS:

Element: **4.4.4**

FINDING:

CO OFI 1: JRAs that are considered high-risk should be reviewed and updated as necessary but at a minimum of 3 yr cycle. Review/update CO-JRA-3 (Pulse-Pump probe, LEAF), last updated 3/10/05, to incorporate any changes to the associated ESR (CO-4-9) which was recently updated in Dec 2007. This JRA has been determined by the department as a 'High' priority assessment.

OFI 2: For FRA-09 Other staff members, who may occupy or pass by these areas, should be considered as risk team members to improve the communication of the specific controls identified in the FRA

| | | | T | | | | | |
|---|--|--|--|---|----------------------|----------------------|-----------|-------------------|
| Organization: BES Directorate | | | Date: 3-13-08 | Auditor: J. Taylor/W. Litzke | | | | |
| Element: 4.3.3 | | Title: (| Objectives and progra | nm(s) | | | | |
| relevant functions and levels within Objectives shall be measurable, whe prevention of injury and ill health, a continual improvement. When establishing and reviewing it requirements to which the organizationarial, operational and business. The organization shall establish in include at a minimum: a.) designational levels of organizations; and b.) the The program[s] shall be reviewed are achieved. | the organiere practic to compliants objective, ation subscriere or requirement, a tion of resport means and | on shall establish, implement and maization. cable, and consistent with the OH&S nice and other requirements to which is, an organization shall take into accordises, and its OSH risks. It shall also nits, and the views of interested particular maintain a program[s] for achieving maintain a program of it for achieving the consibilities and authority for achieving time frame by which the objectives and planned intervals and adjusted and planned intervals and adjusted and planned intervals and adjusted and ad | intain documented OF policy, including the of the organization subsection count the legal require to consider its technologies es ving its objectives. Pro ng objectives at releva are to be achieved. | &S objectives, at commitments to the cribes, and to ments and other gical options, its ogram[s] shall and functions and | Major Non-Compliance | Minor Non-Compliance | OFI | Meets Requirement |
| Is there a documented freque | ency to revi | ished and at what frequency? iew status of objectives? (other than ned on an annual basis and reviewed | | n the BES Self- | | | | \boxtimes |
| including the commitments to the organization subscribes, Observed State: The objectiv OS&H/EMS Management Pla For the BES this would included directorates/departments, and | o the preve and to cont es are mean an depend of de developi the NRTL dates and fl | racticable? Are they consistent with intion of injury and ill health, to continual improvement? surable and linked to site level objecton SHSD and institutional coordinating a BES Directorate plan for closin inspections of non-high priority equal low-down of corrective actions is reconstituted. | inpliance and other red tives. However, certain ion for corrective action g the 10CFR851 gaps ipment. | quirements to which actions in the plan development. | | | | |
| responsibilities and authority be achieved. Observed State: OSH program OSH/EMS FY07 Plan Status | for achievem is impler shows resp | ogram[s] for achieving its objectives ving objectives; and b.) means and a mented by the OSH/EMS manager for consible person and completion dates | or BES (J. Taylor). A rest of actions for targets a | the objectives are to | | | | ⊠ |
| Observed State: The ALD for (Feb 6, 2008). Guests and sor communication. This information by BNL managers, PIs and staff | r BES com me postdoc ation is also be aware a | employee/guests that are supposed to municates to all staff on their ESH of its who do not have BNL email address to available on the intranet website for and contribute to the achievement of of the who do not have computer access. | bjectives by email to a sses may not be able to r BES directorate. It is | o access this most critical that | | | | × |
| OSH/EMS Management Plan BES, | ement Rev | REVIEWED: iew FY2007 presentation (Nov. 14, 7 lan Status, Email from J. Misewich (| | | S Directo | orate (Jai | n. 3, 200 | 8), |
| COMMENTS: | C 1 : | 10 1 0 0 | | | | | | |
| FINDING: OFI: Better coordination | on of dates | and flow-down of corrective actions | s is recommended | | | | | |
| Organization: BES Directorate | | Date: 3-13-08 | | Auditor: J. Ta | vlor/W. l | Litzke | | |

Title: **Documentation**

| OHSAS 18001 STANDARD: The OH&S management system documentation shall include: a.) the OH&S Policy and objectives; b.) description of the scope pf the OH&S management system; c.) description of the main elements of the OH&S management system and their interactions, and reference to related documents; d.) documents, including records, required by this OHSAS Standard; and e.) documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risks. | Major Non- Compliance | Minor Non- Compliance | OFI | Meets Requirement |
|---|--------------------------|--------------------------|-------------|----------------------|
| 1. Does the organization maintain OH&S management system documentation for the following? Record location of the document/record: OSH/EMS Controlled Documents binder in OSH/EMS Management Representative's office | | | | |
| a. Description of the scope of the OH&S management system for its organization (or does it fit within the SBMS scope) The BES OSH management system description makes use of SBMS requirements but also adds specific BES information. The BES OSH mgt sys desc has broken links and needs to be updated for current CFN operating mode and OHSAS subject area. OFI 1: Streamline the management system description, and consolidate the separate OSH & EMS web pages into one. | | | | |
| b. Description of the main elements of the OH&S management system and their interactions, and reference to related documents (\(\subseteq \) or does it fit with the SBMS Subject Area) Same response as to a. | | | | |
| c. Documents & records required by this OHSAS 18001 Standard, such as Hazard List: Hazards are identified in ESRs, JRA/FRAs (both found on dep't websites), and FUAs (found in SBMS) Risk Assessments: Can be found on department websites Objectives: Can be found on BES website Management Reviews: Can be found on BES website OFI 2: Issue a BES controlled records list OFI 3: Include the IH self-assessment in the BES FY08 Self Assessment Plan | | | × | |
| d. Documents & records necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risk Controlled Document Postings: BES ESH Controlled Documents List is located on BES website. Record Storage location (or does it use Foremost only): The location of BES Directorate and Department records are indicated in the BES OSH & EMS mgt sys des. Chemistry department ESH records are located at the main office (555), Room 200E. CMPMS department ESH records are stored in 480 across from the main office. Monitoring Records: These are maintained at SHSD, bldg. 120 and Compliance Suite database. ESH coordinators do not necessarily have easy access to IH monitoring records. OFI 4: An OFI has been identified to improve access of IH records (Compliance Suite) by ESH Coord. | | | \boxtimes | |
| PROCEDURES AND DOCUMENTATION REVIEWED: OHSAS SBMS subject area, BES OSH mgt sys desc R4, BES Cont BES FY08 ESH Management Review, CO/PM/NC JRA/FRAS, BES FY08 Objectives & Targets. Interviewed A. Lopez (record | | | | |
| COMMENTS: | | | | |
| FINDING: No non-compliances and 3 OFIs: OFI 1: Streamline the management system description, and consolidate the separate OSH & EMS web pages into one. OFI 2: Issue a BES controlled records list OFI 3: Include the IH self-assessment in the BES FY08 Self Assessment Plan. OFI 4: An OFI has been identified to improve access of IH records (Compliance Suite) by ESH Coord. | | | | |

| Organization: BES Departments | | Date: 3-27-08 | Auditor: J. | . Taylor/ | W. Litzl | ке | |
|---|---|--|---|----------------------|----------------------|-----|-------------------|
| Element: 4.4.5 | Title: | Control of Documents | | | | | |
| controlled. Records are a special of 4.5.4. The organization shall establish, in b) review and update as necessary documents are identified; d.) ensur that documents remain legible and organization to be necessary for the | ocuments required by the OH&S management sy type of document and shall be controlled in acco- inplement and maintain procedure[s] to: a) app. and re-approve documents; c) ensure that chan, we that relevant versions of applicable documents readily identifiable; f.) ensure that documents of the operation of the OH&S manager went the unintended use of obsolete documents a | ordance with the requirements for adequacy pages and the current revisions safe available at points of use of external origin determined by the ment system are identified and | given in prior to use; tatus of ; e.) ensure by the their | Major Non-Compliance | Minor Non-Compliance | IHO | Meets Requirement |
| document?. Observed State: BES maintai | ns a Controlled Document Master List that contrare reviewed and updated accordingly when the indicate approval. | ains review periods. Departme | ent records | | | | |
| track changes, margin bars, and Observed State: There is ind is not consistently done through | e that changes and the current revisions status italics, or part of the document that reviews charication of when the documents were last reviewed by the update and the documents were last reviewed by the update and | nges.) ed and/or updated, but tracking | g of changes | | × | | |
| Observed State: The Depart | e that relevant versions of applicable document ments have current versions of the ESH document the labs where they are used. Equipment manu | nts such as ESRs and SOP's of | | | | | \boxtimes |
| Observed State: These docu | nsure that documents remain legible and readi ments are managed by the ESH coordinator and ntified by ESR/FRA/FRA number. The web sit | filed according to subject matt | ter, | | | | |

| Observed State: Equipment n the associated equipment and OFI: A consistent manner fo | Observed State: Equipment manuals are considered external documents. These manuals are generally kept in labs of the associated equipment and owner. OFI: A consistent manner for retention, control and retrievability of these types of documents, such as equipment | | | | | | |
|---|---|---|--|--------------------------|--------------------------|---------|----------------------|
| manuals, needs to be established. How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: ESRs are marked "Before using a copy of this form, verify it is the most current version by checking the document effective date." Copies obtained from the web site ensure that they are the most current versions. | | | | | | | |
| PROCEDURES AND DOCUMEN | TATION REVIEWED: CO-FRA-3 and | | | provals l | pased on | improve | ements |
| to operations and hazard controls. I COMMENTS: | ESR-58 (PM2005-077) | | | | | | |
| | entation of a method for change identification, control and retrievability of these | | | | establisl | hed. | |
| | | | | | | | |
| Organization: BES Directorate | | Date: 3/11/08 | Auditor: . | J. Taylor | /W. Litzl | ке | |
| Element: 4.4.6 | | Title: Operational Control | | | | | |
| identified hazard(s) where the implemanagement of change. For those operations and activities, the organization and its activities; the management system; b.) controls reother visitors to the workplace; d.) of from the OH&S policy and the objective management system. | e organization shall determine those oper ementation of controls is necessary to me the organization shall implement and me the organization shall integrate those oper elated to purchased goods, equipment and documented procedures, to cover situation excitives; e.) stipulated operating criteria versions. | anage the OH&S risks. This shall inc aintain: a) operational controls, as apprational controls into its overall OH& d services; c.) controls related to controls where the absence could lead to do | lude the elicable to S ractors and eviations | Major Non- Compliance | Minor Non- Compliance | OFI | Meets Requirement |
| the OSH policy and the objectives. 1. Does the organization have p | program[s] to implement: | | | | | | |
| operational controls into its of subject areas for operational controls related to purch requisition system which has via web requisition or use of a c.) controls related to control process to the ESH Coordinat and work permits are used. d.) procedures to cover situation of the control of | pplicable to the organization and its accoverall OH&S management system: BE controls. The manner in which SBMS is mased goods, equipment and services; Be built in controls. BES has recently instituted in the blanket purchase order (Chemistry Department and other visitors to the workplator and Work Control Manager for contrations where the absence could lead to be be seen the proposal (CFN), COSA (CFN), CFN, CFN), CFN, CFN, CFN, CFN, CFN, CFN, CFN, CFN | S Departments use and comply with S used is described on the department of ES uses and complies with the SBMS utes a policy that chemicals can only be attended on the department only). The etc. Web req has a set of questions that actors and visitors. Contractors take the deviations from the OH&S policy and the deviations from the OSH policy and the deviations from the OSH policy and the other policy and | BBMS perations web per ordered t refers EVO training d the | | | | |
| Observed State: The procedu | res and controls mentioned above in a-e | are in place and operating well. | | - | | | |
| Observed State: Management that add new hazards or ampli | programs include the management of of change is handled by training scientify existing hazards, all of which requires for operational activities that have haze | sts to be sensitive to modifications to s an ESR revision. Work Control Mar | | | | | \boxtimes |
| operational controls in place Observed State: Accomplishe | d through 1) CVO training for contracto | ors, and 2) work planning | | | | | |
| PROCEDURES AND DOCUMEN and ESRs | TATION REVIEWED: Work Planning | and Control subject area, Department | Operations P | ans – we | b based, | work pe | ermits |
| | ed in accordance with the controls ment | ioned above. | | | | | |
| FINDING: No non-compliances or | OFIs | | | | | | |
| O ' I' PEG D' ' | | D + 2/12/00 | | | XX7 Y ** * | | |
| Organization: BES Directorate Element: 4.5.4 | | Date: 3/12/08 | Auditor: | J. I aylor/ | W. Litzk | te | |
| OHSAS 18001 STANDARD: The conformity to the requirements of it | organization shall establish and mainta organization shall establish and mainta so OH&S management system and of this aplement and maintain a procedure(s) fo e, identifiable and traceable | s OHSAS Standard, and the results acid | hieved. | Major Non- Compliance | Minor Non- Compliance | OFI | Meets Requirement |
| and disposal of records? | ment its own procedure(s) for the ident S subject area is used for records contro | | l, retention | | | | \boxtimes |

| 2. Are organization's OSH records legible, identifiable and traceable? Observed State: Yes | | | | \boxtimes |
|--|-----------|-----------|-----------|-------------|
| 3. Are the records stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss? (Evaluate at least three record locations/owners) Observed State: Yes | | | | |
| Location: Chemistry B555 room 200F | | | | |
| Location: BES B460 ALD area | | | | \boxtimes |
| Location: CFN B735 | | | | \boxtimes |
| Location: CMPMSD B480 room 1-104 | | | | \boxtimes |
| PROCEDURES AND DOCUMENTATION REVIEWED: OSH/EMS directorate level program documents, e.g. mgt sys desc, documents list; department records, e.g. ESRs, LEAF SAD, injury reports | objective | es & targ | ets, cont | rolled |
| COMMENTS: The CFN is just transitioning into the operations phase and is in the process of establishing its operations record meeting on this has been set for $4/1/08$. The other 2 departments and the directorate office have established records areas. | s manage | ement sy | stem. A | |
| FINDING: OFI1: CMPMSD has identified an OFI to improve the labeling scheme for their ESH records. | | | | |

BES: Summary of Opportunities for Improvement (OFIs) & Findings

| OHSAS Element | OFI/Finding Type | <u>Summary</u> |
|-------------------------------------|------------------|--|
| 4.3.1 Planning for Hazard | OFI | The CMPMSD new employee orientation form contains potential training |
| Identification, Risk Assessment and | | requirements outside of CMPMSD facilities. Training requirements for the CFN |
| Risk Control | | should be added to the form |
| | OFI | Add Noise & Hearing Conservation training for users of B480 machine shop |
| | OFI | Review JRA associated with revised ESR CO-4-9 |
| | OFI | Communicate results of Chemistry FRA on working in high noise areas to all affected staff |
| | OFI | For future revisions, expand JRA/FRA review teams to include researchers and administrative workers |
| 4.3.3 Objectives and programs | OFI | Better coordination of dates and flow down of corrective actions between Lab |
| | | level and directorates/departments is recommended |
| 4.4.4 Documentation | OFI | Streamline the OHSAS program description and OSH/EMS web pages |
| | OFI | Issue a BES controlled records list |
| | OFI | Include the FY08 IH self assessment in the BES SA Plan |
| | OFI | Improve access to IH records in the Compliance Suite data base |
| 4.4.5 Control of Documents | Minor | Implementation of a method for change identification needs to be consistently |
| | Non-Compliance | used across the directorate |
| | OFI | For documents of external origin, e.g. equipment manuals, a consistent manner of retention, control and retrievability needs to be established |
| 4.4.6 Operational Control | None | |
| 4.5.3 Incident Investigations, | None | |
| Nonconformity, Corrective and | | |
| Preventive Action | | |
| 4.5.4 Control of Records | OFI | Improvements were identified in the labeling scheme for the CMPMSD ESH records |

During the month of March an internal audit of OHSAS programs was conducted. Wai-Lin Litzke and I served as the auditors for BES. We reviewed documents and their control, observed and interviewed staff. The ESH Coordinators were involved in the audit, both as auditors and those being audited; they provided constructive input to Wai-Lin and me. The elements of OHSAS 18001 are required to be audited every 3 years, so a third of the elements were audited this year. The elements that were audited addressed the following subjects: hazard & risk identification and control, objectives, documentation & records control, operational control and incident investigation.

Our overall assessment is that the BES Occupational Safety and Health programs are functioning well, that hazards and risks are identified and controlled, and that our staff are informed and comply with requirements. The results are summarized in the attached table; there were 1 minor non-compliance and 12 opportunities for improvement (OFIs). The minor non-compliance is related to the identification of changes – we need to establish a consistent method for change identification of our documents (including ESRs) across the directorate. The OFIs address issues such as communications, training, and documentation improvements.

Attachment 5 EENS Directorate Checklists

| Organization: EENS | ganization: EENS Date: 3/26/08 Auditor: J. Peters | | | | | | |
|---|--|--|---------------------------------|-------------|-----------|-----------|-------------|
| Element: 4.3.1 | Title: Planning For Hazard Id | lentification, Risk Assessmer | t and Risk C | ontrol | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization use a n SBMS OHSAS 18001 Program Observed State: | nethodology of documenting risk assessment a m ? _X No Yes. | ind control other than that des | scribed in | | | | |
| non routine activities; all pers Observed State: | sk Assessments up-to-date? Do they cover curresonnel and all facilities? view dates and Work Permits & FRA's for maci | | outine and | | | | \boxtimes |
| 3. Have changes occurred in the assessments? Were they up-to Observed State: FRA for Bldg. 490D reflected JRA for Machine Shop Work JRA for Operating Vehicles id then time of the incident so inf | e organization's facilities or operations that ne o-dated to cover the scope of the change? changes in hazard & risk after roof repair. was changed after IH monitoring identified noi lentified additional controls resulting form an information was added. | se concern. ncident; the JRA was under dev | velopment at | | | | |
| d.) signage/warning and/or ad within risks assessments and of Observed State: Document reviewed: Ma 490 Document reviewed: JRA Document reviewed: JRA Coordinator | chine Shop Work Permit – and discussion with A -010 Autoclave Use – and discussion with ES A – 009 Work with routine chemicals in laborate | quipment) when determining of ESH Coordinator and shop su | pervisor for | | | | \boxtimes |
| | lace and working as specified? rk permits, JRAs and onsite observations/interv | views indicate controls are in-p | lace and | | | | \boxtimes |
| Observed State: Onsite visit to 815 lab C-2 dumanufacturer representative M prior to work, worker informed The installer was not sure if hi | ring installation of new glove box by contractor. I. Dubiansky of MBraun. Work control procedud by PI of hazards in lab. Is training was current for laboratory standard ork, was under the direct supervision of the PI, a | r. Discussion with PI J. Johnsones were followed, hazards elimated to the result of th | n and minated oes not use | | | | |
| PROCEDURES AND DOCUMENT Machine Shop Work Permit JAR 010 – Autoclave Use JRA 009 – Work with routine chemic | icals in laboratories ermit Log for Standing Work Permits ons DD Listing of Facility Risk Assessments of Job Risk Assessments | | | | | | |
| Opportunity for improvement: Reco communication. of workers installin FINDING: None | ommend review of requirements to determine if ag equipment in laboratory settings. | there is a need for technicians | to be current | in laborat | tory stan | dard or l | nazard |
| | | | | | | | |
| Organization: EENS | | Date: 3/26/08 | Aud | itor: J. Pe | eters | | |
| Element: 4.3.3 | Title: C | Objectives and program(s) | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| Is there a documented frequent Observed State: | ives established and at what frequency? ncy to review status of objectives? (other than ually at a minimum but can be adjusted as need | , | | | | | |

| including the commitments to the organization subscribes, Observed State: | tle, where practicable? Are they consistent will the prevention of injury and ill health, to contain and to continual improvement? Improvement of programs including prevention | mpliance and oth | er requirements to which | | | | |
|--|--|------------------------------------|--------------------------|--------------|-------|-------|-------|
| Review of status indicates designation, authority and schedules are set and tracked. EENS has developed a Working With Nanomaterials checklist to be used for completion of one objective. | | | | | | | |
| 4. How are objectives made known to the employee/guests that are supposed to achieve them? Observed State: Discussion with the ESH Coordinator indicated objectives are discussed and agreed to prior to acceptance of the objective. Then objectives are tracked to completion. | | | | | | | |
| PROCEDURES AND DOCUMEN Status of EENS ESH FY07 Object Status of EENS ESH FY08 Objecti EENS ESH Newsletter, March 200 EENS Working With Nanomaterial COMMENTS: None FINDING: None | tives and Targets ives and Targets 18 | | | | | | |
| | | | | | | | |
| Organization: EENS | | Date: | 3/26/ A | ıditor: J. P | eters | | |
| Element: 4.4.4 | , | Title: Documenta | ntion | | | | |
| Audit question | | | Major | Minor | OFI | Meets | |
| 1. Does the organization maintain OH&S management system documentation for the following? Record location of the document/record: Directorate Research Operations Office | | | , | | | | |
| a. Description of the <u>scope</u> of th scope) | a. Description of the scope of the OH&S management system for its organization (or does it fit within the SBMS | | | | | | |
| □ b. Description of the main elem documents (☑ or does it fit with the | | heir interactions, | and reference to related | | | | |
| c. Documents & records required to Hazard List Risk Assessments Objectives Management Reviews | by this OHSAS 18001 Standard, such as | | | | | | |
| d. Documents & records necessary management of its OH&S risk Controlled Document Postings Record Storage location (or do | we to ensure the effective planning, operation as: some documents are posted at the work site (ses it use Foremost only) Directorate level storages Who maintains original documents/rec | see note below) ge in building 185 | | | | | |
| PROCEDURES AND DOCUMEN Status of EENS ESH FY07 Object Status of EENS ESH FY08 Objecti EENS ESH Newsletter, March 200 | tives and Targets ives and Targets | | | | | | |
| A recent EMS audit identified received a new copy within 45 days of expiril date postings. | iles and are marked/stamped Obsolete ntly expired ESRs in laboratories These docu- ration. Corrective actions have been put in pla | | | | | | |
| FINDING: None | | | | | | | |
| Organization: EENS | | Date: 3/26/08 | A | uditor: J. P | eters | | |
| Element: 4.4.5 | Title | e: Control of Doo | cuments | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| document?. Observed State: | we documents for adequacy prior to use and reviewed prior ves & Targets are all thoroughly reviewed prior | - | necessary and re-approve | | | | |

| track changes, margin bars, i Observed State: JRAs show revision status ar reference but is marked as ob | talics, or part of the document that review d changes made. Other documents track of solete. | changes. The obsolete document is retained | | | ם | | \boxtimes |
|--|--|--|-------------|---------|--------|----------|-------------|
| Observed State: BNL ESH&Q Safety Policy, locally. See comments below | ESRs and Work Permits are posted at the | at relevant versions of applicable documents are available at points of use? As and Work Permits are posted at the work site. Equipment manuals are maintained review of currency on documents/records at point of use. | | | | | |
| 4. How does the organization en Observed State: Hard copies of the documents | nsure that documents remain legible and are retained and controlled at the director | re that documents remain legible and readily identifiable? retained and controlled at the directorate level under the auspices of the ESH well identified and stored in file cabinets. | | | ם ב | | \boxtimes |
| 5. Are OH&S documents extern Observed State: | | origin identified and their distribution controlled? | | | | | \boxtimes |
| 6. How does the organization p them if they are retained for Observed State: | revent the unintended use of obsolete do any purpose (ie. Stamped "obsolete" or o | cuments and apply suitable identification to other suitable wording)? Opies of obsolete documents were presented | | [|] | | \boxtimes |
| Storage of documents was observed Interviews with onsite personnel w EENS ESH Newsletter, March 200 COMMENTS: A recent EMS audit identified expi | or and a review of documents were conducted and included questioning reasons to the second se | egarding document control. ernal EENS procedure frequiring a new cop | y within 45 | days o | f exp | iration. | |
| Onsite interviews with J. Johnson a | ow SBMS. Observations during this audit and T. Watson indicate experimental equip Control of Documents: external documents. | oment manuals are not fully controlled. | | | | | |
| | ecklist 4.4.5b Final Rev0 01/30/08 | Site File Code: HP80.7 | | | | | |
| Organization: EENS | | Date: 3/26/08 | Auditor: J | Datare | , | | |
| Element: 4.4.6 | | Datc. 3/20/06 | Auditor. J | 1 CtCl3 | , | | |
| Element. 4.4.0 | | Title: Operational Control | | | | | |
| Element. 4.4.0 | Audit question | Title: Operational Control | Major | TATHIAL | Minor | OFI | Meets |
| Does the organization have p | program[s] to implement: s applicable to the organization and its acoverall OH&S management system; chased goods, equipment and services; tractors and other visitors to the workplatuations where the absence could lead to eiteria where their absence could lead to be you specified to service the service of the workplatuations. | ctivities; the organization shall integrate the ce; deviations from the OH&S policy and the deviations from the OSH policy and the devi | | LATINOT | Minor | OFI | Meets |
| 1. Does the organization have p | program[s] to implement: s applicable to the organization and its aboverall OH&S management system; chased goods, equipment and services; tractors and other visitors to the workplatuations where the absence could lead to exiteria where their absence could lead to exiteria where thei | ctivities; the organization shall integrate the ce; deviations from the OH&S policy and the deviations from the OSH policy and the devi | ose are | | Minor | OFI | |
| 1. Does the organization have p | program[s] to implement: s applicable to the organization and its accoverall OH&S management system; chased goods, equipment and services; tractors and other visitors to the workplate tractions where the absence could lead to exiteria where their absence could lead to exiteria where | cetivities; the organization shall integrate the ce; deviations from the OH&S policy and the deviations from the OSH policy and the oment of JRAs, FRAs etc are aligned with decontractor personnel. The contractor personnel arrange? The contractor is a contractor of the directorate operate suppliers and contractors (are decinicated that suppliers/contractors are information). | are | | | | |
| 1. Does the organization have p | program[s] to implement: s applicable to the organization and its accoverall OH&S management system; chased goods, equipment and services; tractors and other visitors to the workplate functions where the absence could lead to exiteria where their absence could lead to exiteria where | ctivities; the organization shall integrate the ce; deviations from the OH&S policy and the deviations from the OSH policy and the oment of JRAs, FRAs etc are aligned with decontractor personnel. Tange? SRs are reviewed such as when new hazards to determine applicability to the directorate opriate suppliers and contractors (are indicate that suppliers/contractors are information. | are | 1 | | | |

| Organization: EENS | | Date: 3/26/08 | Aud | itor: J. P | eters | | |
|--|--|---|--------------|------------|-------|-------------|-------------|
| Element: 4.5.3 | Title: Incident investig | ations, Nonconformity, Corrective an | d Preventive | Action | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| | Does the organization use their own procedure(s) for record, investigate and analyze incidents? (rely on SBMS)? No they rely on SBMS | | | | | | |
| 1. Is it effective to: | tive actions; eventative action; ontinual improvement; | night be causing or contributing to the | occurrence | | | | \boxtimes |
| 2. Were investigations per Observed State: EENS had a recent, minor inc discussions, and JRA review A second incident involved a | formed in a timely manner? (Determination of the content of the co | n building 490 on 12/04/07. The follow- | ·up, | | | | \boxtimes |
| Observed State: Yes. For 490 discussion of un roof repairs to prevent reoccu | | sue and recommendations were made to | prioritize | | | | \boxtimes |
| Observed State: Owner of both investigations | How were the results of incident investigation documented and maintained? | | | | | \boxtimes | |
| Observed State: A review of the JRA -012 wa | Were risk assessments conducted or revised as a result of incidents/events? Observed State: A review of the JRA -012 was conducted and the decision was that no changes were necessary. A review of the JRA - 026 was conducted and recommendations added to the JRA. | | | | | | \boxtimes |
| preventative actions? Observed State: | preventative actions? | | | | | | \boxtimes |
| PROCEDURES AND DOCUMEN Memo to File P. Carr Follow-up Ad | ctions to the 12-4-07 Injury | | | | | | |
| COMMENTS:EENS Directorate for FINDING: None | ollows SBIMS procedures. | | | | | | |
| | | | | | | | |
| Organization: EENS | | Date: 3/26/08 | Aud | itor: J. P | eters | | |
| Element: 4.5.4 | | Title: Control of Records | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| Does line organization imple and disposal of records? Observed State: EENS follows SBMS | ment its own procedure(s) for the iden | tification, storage, protection, retrieval | , retention | | | | \boxtimes |
| Are organization's OSH reconstruction Observed State: Hard copies of the records are Rep/ESH Coordinator. The document of the records are Rep/ESH Coordinator. | ords legible, identifiable and traceab e retained and controlled at the directoral ocuments are well identified and stored as ie. S&H services are maintained under | ate level under the auspices of the OSH/in file cabinets. | EMS | | | | \boxtimes |
| 3. Are the records stored and deterioration or loss? (Eval Observed State: | | retrievable and protected against da wners) | mage, | | | | |
| | ch Operations Office in Building 185 | a protocola sinto. | | | | | \boxtimes |
| Location: Some official recor electronically. | ds (eg. EENS Research Operations Wo | rk Permit Log for Standing WP's) are n | naintained | | | | |
| Location: A machine shop in | | Machine Shop Qualified Operators Build | | | | | |

| OHSAS 18001 INTERNAL AUDIT OF BNL ORGANIZATIONS FY2008 |
|--|
| Attachment 5 |

Final Rev0 04/22/08

Page 18 of 73

| Location: Local user – operating manuals B815 lab C-2 & E-4 | | | \boxtimes | |
|--|-----------|---------|-------------|--|
| PROCEDURES AND DOCUMENTATION REVIEWED: | | | | |
| EENS Directorate OH&S Records/Documents Management | | | | |
| EENS Machine Shop Work Permit | | | | |
| EENS Autoclave Use Work Permit | | | | |
| EENS FRA 490D | | | | |
| JRAs 002 Machine Shop Work; 009 Work with Routine Chemicals in Laboratories;010 Autoclave Use; 026 Operating Vehicle | s On-site | and Off | - site | |
| EENS Research Operations Office Listing of FRAs | | | | |
| EENS Research Operations Office Listing of JRAs | | | | |
| EENS Machine Shop Qualified Operators Building 815 | | | | |
| EENS Research Operations Work Permit Log for Standing WP's | | | | |
| Memo to file; P. Carr Follow-up Actions to the 12-4-07 Injury | | | | |
| Status of EENS ESH FY08 Objectives and Targets | | | | |
| Status of EENS ESH FY07 Objectives and Targets | | | | |
| EENS ESH Newsletter March 2008 | | | | |
| EENS Working with Nanomaterials Surveillance | | | | |
| COMMENTS: | | | | |
| Electronic format is under control of a single individual. | | | | |
| | | | | |
| FINDING: | | | | |
| OFI | | | | |
| 1) Review procedure for control of OSH documents for equipment manuals. | | | | |
| 2) Recommend review of document control for machine shop qualified operators JP - Can we discuss this - PC | | | | |

Attachment 5 Environmental Restoration Projects

| Organization: ERP | | Date: 3/10 | / Audito | or: B. He | neveld | | |
|---|--|--|---------------------------|-----------|--------|-------|-------------|
| Element: 4.3.1 | Title: Planning For Hazard l | Identification, Risk Assessme | nt and Risk C | ontrol | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization use a r SBMS OHSAS 18001 Progra Observed State: | methodology of documenting risk assessment um ? _X_No Yes | and control other than that de | escribed in | | | | \boxtimes |
| 2. Are the line organizations Ri non routine activities; all per Observed State: Up to date, fu | | rrent full scope of operations; | routine and | | | | |
| | e organization's facilities or operations that not of the change? | necessitated a change in the ris | sk | | | | \boxtimes |
| d.) signage/warning and/or ac within risks assessments and Observed State: Document reviewed: HI Document reviewed: ER | the hierarchy of controls (i.e.: a.) elimination dministrative controls; e.) personal protective other planning documents? FBR S&M 037 Move Shielded Cask RP WP 2.23 HFBR Trane Absorber Fluid Rem RP WP 2.24 Reactor Fill and Drain | equipment) when determining | | | | | \boxtimes |
| 5. Are operational controls in p Observed State: Yes, Based u | lace and working as specified? pon observation. | | | | | | \boxtimes |
| 6. What is the mechanism to inj Observed State: Training Imp | form contractors/interested parties of relevant | t operational controls applying | g to them? | | | | \boxtimes |
| PROCEDURES AND DOCUMEN | TATION REVIEWED: See item #4 above. | | | | l | l | |
| COMMENTS: None FINDING: Meets Requirements. | | | | | | | |
| THOMAS. Weeks recommends. | | | | | | | |
| | | | | | | | |
| Organization: ERP | | Date: 3/10/08 | Audito | or: B. He | neveld | | |
| Organization: ERP Element: 4.3.3 | Title: | Date: 3/10/08 Objectives and program(s) | Audito | or: B. He | neveld | | |
| | Title: | | Audito | or: B. He | Minor | OFI | Meets |
| Element: 4.3.3 1. Are organization level Object | Audit question tives established and at what frequency? Yesency to review status of objectives? (other than | Objectives and program(s) | Audito | | | OFI 🗆 | Meets |
| I. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurabincluding the commitments to the organization subscribes, or | Audit question tives established and at what frequency? Yesency to review status of objectives? (other than | Objectives and program(s) annually. a SBMS) th the site level objectives, OH | I&S policy, | Major | Minor | | |
| 1. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurabincluding the commitments to the organization subscribes, Observed State: Yes, Reviewed 3. Has the organization implements and authority be achieved. | Audit question tives established and at what frequency? Yes ency to review status of objectives? (other than ally. le, where practicable? Are they consistent win to the prevention of injury and ill health, to co and to continual improvement? ed 2008 Targets and Objectives. tented a program[s] for achieving its objective to for achieving objectives; and b.) means and | Objectives and program(s) annually. a SBMS) th the site level objectives, Offi mpliance and other requirements? Does it include a.) designa | I&S policy, ents to which | Major | Minor | | |
| 1. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurable including the commitments to the organization subscribes, of Observed State: Yes, Review A Has the organization implements to the organization implements of the organization of | Audit question tives established and at what frequency? Yes, ency to review status of objectives? (other than ally. Ite, where practicable? Are they consistent with the prevention of injury and ill health, to co and to continual improvement? ed 2008 Targets and Objectives. The program[s] for achieving its objective to for achieving objectives; and b.) means and SAS Target and Objectives. The proposed of the objectives of the objective of the objectives of the objectives of the objectives. The proposed of the objectives of the objective of the | Objectives and program(s) annually. a SBMS) th the site level objectives, OH mpliance and other requireme s? Does it include a.) designatime frame by which the objective | I&S policy, ents to which | Major | Minor | | |
| 1. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurabe including the commitments to the organization subscribes, o Observed State: Yes, Review 3. Has the organization implem responsibilities and authority be achieved. Observed State: Yes, See OH 4. How are objectives made kno Observed State: Weekly safet PROCEDURES AND DOCUMEN | Audit question tives established and at what frequency? Yes ency to review status of objectives? (other than ally. Ite, where practicable? Are they consistent with the prevention of injury and ill health, to co and to continual improvement? and 2008 Targets and Objectives. Tented a program[s] for achieving its objective to for achieving objectives; and b.) means and SAS Target and Objectives. The province of the supposed to the employee/guests that are supposed to the employee/guests that are supposed to the tented of the control of th | Objectives and program(s) annually. a SBMS) th the site level objectives, OH mpliance and other requireme s? Does it include a.) designatime frame by which the objective | I&S policy, ents to which | Major | Minor | | |
| I. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurable including the commitments to the organization subscribes, of Observed State: Yes, Reviewed 3. Has the organization implement responsibilities and authority be achieved. Observed State: Yes, See OH: 4. How are objectives made known observed State: Weekly safet PROCEDURES AND DOCUMEN ERP 2008 OHSAS Targets and Objectives made Not observed State: Weekly safet PROCEDURES AND DOCUMEN ERP 2008 OHSAS Targets and Objectives Manual Comments: None | Audit question tives established and at what frequency? Yes ency to review status of objectives? (other than ally. Ite, where practicable? Are they consistent with the prevention of injury and ill health, to co and to continual improvement? and 2008 Targets and Objectives. Tented a program[s] for achieving its objective to for achieving objectives; and b.) means and SAS Target and Objectives. The province of the supposed to the employee/guests that are supposed to the employee/guests that are supposed to the tented of the control of th | Objectives and program(s) annually. a SBMS) th the site level objectives, OH mpliance and other requireme s? Does it include a.) designatime frame by which the objective | I&S policy, ents to which | Major | Minor | | |
| 1. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurabe including the commitments to the organization subscribes, o Observed State: Yes, Review 3. Has the organization implem responsibilities and authority be achieved. Observed State: Yes, See OH 4. How are objectives made kno Observed State: Weekly safet PROCEDURES AND DOCUMEN ERP 2008 OHSAS Targets and Objectives and | Audit question tives established and at what frequency? Yes ency to review status of objectives? (other than ally. Ite, where practicable? Are they consistent with the prevention of injury and ill health, to co and to continual improvement? and 2008 Targets and Objectives. Tented a program[s] for achieving its objective to for achieving objectives; and b.) means and SAS Target and Objectives. The province of the supposed to the employee/guests that are supposed to the employee/guests that are supposed to the tented of the control of th | Objectives and program(s) annually. a SBMS) th the site level objectives, OH mpliance and other requireme s? Does it include a.) designatime frame by which the objective | I&S policy, ents to which | Major | Minor | | |
| I. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurabincluding the commitments to the organization subscribes, Observed State: Yes, Reviewed 3. Has the organization implements and authority be achieved. Observed State: Yes, See OH: 4. How are objectives made known Observed State: Weekly safet PROCEDURES AND DOCUMEN ERP 2008 OHSAS Targets and Objectives Meets Requirements. | Audit question tives established and at what frequency? Yes ency to review status of objectives? (other than ally. Ite, where practicable? Are they consistent with the prevention of injury and ill health, to co and to continual improvement? and 2008 Targets and Objectives. Tented a program[s] for achieving its objective to for achieving objectives; and b.) means and SAS Target and Objectives. The province of the supposed to the employee/guests that are supposed to the employee/guests that are supposed to the tented of the control of th | Objectives and program(s) annually. a SBMS) th the site level objectives, OH mpliance and other requireme s? Does it include a.) designatime frame by which the objective | tion of ctives are to | Major | Minor | | |
| I. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurable including the commitments to the organization subscribes, of Observed State: Yes, Reviewed 3. Has the organization implement responsibilities and authority be achieved. Observed State: Yes, See OH: 4. How are objectives made known observed State: Weekly safet PROCEDURES AND DOCUMEN ERP 2008 OHSAS Targets and Objectives made Not observed State: Weekly safet PROCEDURES AND DOCUMEN ERP 2008 OHSAS Targets and Objectives Manual Comments: None | Audit question tives established and at what frequency? Yes, ency to review status of objectives? (other than ally. Ite, where practicable? Are they consistent with the prevention of injury and ill health, to co and to continual improvement? ed 2008 Targets and Objectives. Tented a program[s] for achieving its objective to for achieving objectives; and b.) means and SAS Target and Objectives. The inventor of the employee/guests that are supposed y meetings, training and e-mail. TATION REVIEWED: jectives. | Objectives and program(s) annually. a SBMS) th the site level objectives, OH mpliance and other requireme es? Does it include a.) designa time frame by which the objective of the objectiv | tion of ctives are to | Major | Minor | | |
| I. Are organization level Object Is there a documented freque Observed State: Yes, bi-annua 2. Are the Objectives measurabi including the commitments to the organization subscribes, Observed State: Yes, Review 3. Has the organization implem responsibilities and authority be achieved. Observed State: Yes, See OH: 4. How are objectives made knot Observed State: Weekly safet PROCEDURES AND DOCUMEN ERP 2008 OHSAS Targets and Obj COMMENTS: None FINDING: Meets Requirements. Organization: ERP | Audit question tives established and at what frequency? Yes, ency to review status of objectives? (other than ally. Ite, where practicable? Are they consistent with the prevention of injury and ill health, to co and to continual improvement? ed 2008 Targets and Objectives. Tented a program[s] for achieving its objective to for achieving objectives; and b.) means and SAS Target and Objectives. The inventor of the employee/guests that are supposed y meetings, training and e-mail. TATION REVIEWED: jectives. | Objectives and program(s) annually. a SBMS) th the site level objectives, OH mpliance and other requireme as? Does it include a.) designatime frame by which the object to achieve them? Date: 3/11/08 | tion of ctives are to | Major | Minor | | |

| , | | | | | | | |
|--|--|-------------------------------------|-----------|-----------|-------------|-----|-------------|
| a. Description of the scope of the scope) | BMS | | | | \boxtimes | | |
| □ b. Description of the main elen documents (♥ or does it fit with the | nents of the OH&S management system and the SRMS Subject Area) | heir interactions, and reference to | o related | | | | \boxtimes |
| c. Documents & records required & Hazard List ERP-OPM-4.1, "Er Risk Assessments Each individue Objectives ERP-OPM-4.8, "OH: | c. Documents & records required by this OHSAS 18001 Standard, such as Hazard List ERP-OPM-4.1, "Environment, Safety and Health Plan" Risk Assessments Each individual work package and online Objectives ERP-OPM-4.8, "OHSAS Implementation Manual" Management Reviews Annual review documentation d. Documents & records necessary to ensure the effective planning, operation and control of processes that relate to the | | | | | | |
| management of its OH&S risk ☐ Controlled Document Postings ☐ Record Storage location (See EM) ☐ Monitoring Records (See ERP- | management of its OH&S risk Controlled Document Postings ERP Official bulletin board. Record Storage location (See ERP-OPM-2.6, "Records Management") Monitoring Records (See ERP-OPM-2.6, "Records Management") PROCEDURES AND DOCUMENTATION REVIEWED: ERP-OPM-2.6, "Records Management", ERP-OPM-4.1, "Environment of the control of the c | | | | | | ⊠ lan". |
| and ERP-OPM-4.8, "OHSAS Imple | | | | , | | | , |
| COMMENTS: None. FINDING: Meets requirements. | | | | | | | |
| | | | | | | | |
| Organization: ERP | | Date: 3/11/08 | Audito | or: B. He | neveld | | |
| Element: 4.4.5 | Title | e: Control of Documents | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| document?. Observed State: Yes, ERP-OI | we documents for adequacy prior to use and repair to use and repai | | | | | | |
| Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: Yes, each procedure requires that a revision history be maintained. | | | | | | | |
| | e that relevant versions of applicable documenting binder with procedure copied onto yellow p | | | | | | \boxtimes |
| 4. How does the organization en Observed State: Yes. | nsure that documents remain legible and read | lily identifiable? | | | | | \boxtimes |
| Are OH&S documents extern Observed State: Yes, Signed | nal origin identified and their distribution con original is controlled, additional copies are star | trolled? | | | | | \boxtimes |
| 6. How does the organization p | revent the unintended use of obsolete docume any purpose (ie. Stamped "obsolete" or other | nts and apply suitable identificat | ion to | | | | |
| PROCEDURES AND DOCUMEN | ITATION REVIEWED: | | | | | | |
| ERP-OPM-2.7, "Safety Revie COMMENTS: None. | ew Committee. | | | | | | |
| FINDING: Meets requirements. | | | | | | | |
| Organization: ERP | Da | te: 3/11/08 | Audite | or: B. He | neveld | | |
| Element: 4.4.6 | | e: Operational Control | Trudite | л. Б. ПС | iic v ciu | | |
| | Audit question | o. Operational control | | Major | Minor | OFI | Meets |
| 1. Does the organization have p | · | | | | | | |
| a) operational controls, a | s applicable to the organization and its activite overall OH&S management system; | ies; the organization shall integro | ate those | | | | |
| | chased goods, equipment and services; ERP-(| DPM-1.6, "Procurement Requirem | nents for | | | | |
| Purchased Items/Services" C.) controls related to con System" | tractors and other visitors to the workplace; E | ERP-OPM-1.5, "Training Manager | ment | | | | \boxtimes |
| | tuations where the absence could lead to devide Work Procedure Development and Requiremen | | l the | | | | |
| Stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. Procedure use and adherence. Observed State: Meets requirements. | | | | | | | |
| 2. How do organization OH&S | programs include the management of change | | | | | | \boxtimes |
| | .9, "Configuration Management of Safety Basi requirements communicated to the appropria | | | _ | _ | _ | _ |
| operational controls in place | | | | | | | |

Attachment 5

ERP-OPM-2.6, "Records Management"

FINDING: Meets requirements.

COMMENTS: None.

PROCEDURES AND DOCUMENTATION REVIEWED: ERP-OPM-1.3, "Work Procedure Development and Requirements"; ERP-OPM-1.5, "Training Management System"; ERP-OPM-1.6, "Procurement Requirements for Purchased Items/Services"; and ERP-OPM-1.9, "Configuration Management of Safety Basis Documents". COMMENTS: None. FINDING: Meets requirements. Organization: ERP Date: 3/11/08 Auditor: B. Heneveld Element: **4.5.3** Title: Incident investigations, Nonconformity, Corrective and Preventive Action Minor Meets OF. Audit question Does the organization use their own procedure(s) for record, investigate and analyze incidents? (\boxtimes SBMS)? Yes, ERP-OPM-2.2, "Corrective Action Program and Condition Reporting System" Is it effective to: ☑ a.) determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents; \boxtimes b.) identify the need for corrective actions; \boxtimes \boxtimes c.) identify opportunities for preventative action; ☑ d.) identify opportunities for continual improvement; ☑ e.) communicate the results of such investigations. Were investigations performed in a timely manner? (Determine the timing of investigation[s]) П П П \boxtimes Observed State: Yes, generally in thirty days with several outliers. Were corrective actions or opportunities for preventative action determined? \boxtimes Observed State: Yes How were the results of incident investigation documented and maintained? \boxtimes Observed State: They are documented on Condition Report forms Were risk assessments conducted or revised as a result of incidents/events? \boxtimes Observed State: Yes, condition reports are reviewed to determine if there are revisions necessary to risk assessments. Did the organization record any changes in their documented procedures resulting from corrective and preventative actions? \boxtimes Observed State: Yes, there are significant revision histories of procedures resulting from corrective and preventative actions. PROCEDURES AND DOCUMENTATION REVIEWED: ERP-OPM-2.2, "Corrective Action Program and Condition Reporting System" COMMENTS: None. FINDING: Meets requirements. Organization: ERP Date: 3/12/08 Auditor: B. Heneveld Element: **4.5.4** Title: Control of Records Minor OFI Audit question Does line organization implement its own procedure(s) for the identification, storage, protection, retrieval, retention \boxtimes and disposal of records? Observed State: Yes, ERP-OPM-2.6, "Records Management" Are organization's OSH records legible, identifiable and traceable? \boxtimes Observed State: Yes, all records have file and revision numbers. Are the records stored and maintained such that they are readily retrievable and protected against damage, \boxtimes deterioration or loss? (Evaluate at least three record locations/owners) Observed State: Yes, but there is only one location in Building 701 for record storage. Location: File Storage on the third floor in Room 12 (Copy Room across from elevator). \boxtimes Location: Location: Location: PROCEDURES AND DOCUMENTATION REVIEWED:

Attachment 5 Environment, Safety & Health Directorate

| Organization: ESH- SHSD Date: 03/28/08 A | | | | | NOV. | | |
|---|---|---------------------------------|---------------|------------|-------------|-----|-------------|
| Element: 4.3.1 | T'4 Di . F W . II | | | litor: Sel | vey | | |
| Element. 4.5.1 | Title: Planning For Hazard Io | dentification, Risk Assessmen | t and Risk Co | ontrol | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| SBMS OHSAS 18001 Progra | methodology of documenting risk assessment of tim? _x_NoYes the SBMS listed JRAs and FRAs. | and control other than that des | cribed in | | | | |
| Are the line organizations Risk Assessments up-to-date? Observed State: Yes. SHSD has 15 JRA and 2 FRAs. They are reviewed within the 3-year cycle and all are up to date. 1/3 had been reviewed in FY07. Do they cover current full scope of operations; routine and non routine activities; all personnel and all facilities? Observed State: No. SHSD has two XRF for lead in paint detection. These have radiation sources within. SHSD does not have a JRA to cover this hazard. | | | | | \boxtimes | | |
| 3. Have changes occurred in the organization's facilities or operations that necessitated a change in the risk assessments? Were they up-to-dated to cover the scope of the change? Observed State: No changes in operations in FY08, all operations (except the XRF covered in Risk Assessments. All operation covered in SHSD SOPs. | | | | | | | \boxtimes |
| 4. Did the organization observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Observed State: Document reviewed: SHSD-JRA-11 CMS (combination of training and PPE are controls for handling sealed containers. Document reviewed: IH62300 In-place HEPA Filter testing- Section 5: lower hazard test solution used, Work Permit as needed, Status of active use, PPE described in detail. Document reviewed: IH75250 Soldering Evaluations: Section 4: Prerequisite training and access approval, preliminary hazard assessment, PPE. Document reviewed: SE50700 Requirement Management: administrative task- none listed. | | | | | | | \boxtimes |
| Observed State: The hazardon and monitored monthly for story Other hazard exposure occurs | lace and working as specified? us operations that IH does are conducted in a la brage excess and annually for flow. s during HEPA Filter Testing at various location ed in each location. Corrective action and inter | ns. These operations were halte | ed in FY07 | | | | \boxtimes |
| | form contractors/interested parties of relevant field monitoring contractors. They are required for their tasks. | | | | | | |
| PROCEDURES AND DOCUMEN SHSD-JRA-11 CMS H62300 In-place HEPA H75250 Soldering Eval SE50700 Requirement N COMMENTS: None FINDING: | TATION REVIEWED: A Filter testing luations Management: | | | | | | |
| Minor NC: A new ore update of JR | A-05 is needed to cover the radiological source | hazards, previously un-identifi | ed. | | | | |
| Organization: ESH- SHSD | | Date: 03/28/08 | Auc | litor: Sel | vey | | |
| Element: 4.4.4 | T | itle: Documentation | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| Does the organization maintal document/record: | | | | | | | |
| | e OH&S management system for its organizat ISAS records in file 80.6 in Building 120 Room | | | | | | ⊠ |

records in file 80.7 in Building 120 Room -122. These are accessible to others via the BNL OSH Web Pages and SHSD Web

Pages maintained by SHSD.

secure manner.

| documents (COHSAS & EN | or does it fit with the MS) that is maintaine | nents of the OH&S management system an the SBMS Subject Area) SHSD has a division that do by the SHSD Administrative Assistant in SH Web Pages and SHSD Web Pages maint | n level procedure HP65806 that co Bldg 120 Room 1-23 in File HP65 | vers ISM | | | | \boxtimes |
|---|--|--|--|------------------|------------|-------|-----|-------------|
| Mazard Lis http://www.bn Risk Assess http://www.bn Objectives http://www.bn Manageme | C. Documents & records required by this OHSAS 18001 Standard, such as Hazard List Maintained on the SHSD Web Page at: http://www.bnl.gov/esh/shsd/OHSAS/WordDocs/ESHO/SHSD/SHSD Hazard List.doc Risk Assessments Maintained on the SHSD Web Page at: http://www.bnl.gov/esh/shsd/OHSAS/OSH_SHSD_JRA_FRA.asp Objectives Maintained on the SHSD Web Page at: http://www.bnl.gov/esh/shsd/OHSAS/PDF/SHSD_FY08_OSH_EMS_Objectives.pdf Management Reviews Maintained at the ESH Directorate level, by SHSD. The current version was not posted on the ESHD Web Page: | | | | | | | |
| d. Documents management of Controlled http://www.bn Last updated 0 Record Sto http://www.bn Monitoring interface. | & records necessary of its OH&S risk Document Postings l.gov/esh/shsd/OHSA 17/19/07 orage location (or doc l.gov/esh/shsd/OHSA g Records Maintaine | Maintained on the SHSD Web Page at: AS/WordDocs/ESHQ/SHSD/SHSD_Posted es it use Foremost only) Maintained on the AS/WordDocs/ESHQ/SHSD/SHSD_OHSA ed as hard copies in Bldg 120 Room 1-20 ar | Controlled Document Locations SHSD Web Page at: S 18001 Records and Documen | s.doc Rev 6: | | | | \boxtimes |
| PROCEDURE See above listi | | TATION REVIEWED: | | | | | | |
| COMMENTS None | • | | | | | | | |
| FINDING: | rectorate OSH Manag | gement Review needs to be posted on the ES | SH ISM web page. CORRECTED: | : DONE -3/28/ | 08 | | | |
| | | <u>, </u> | T T | | | | | |
| Element: 4.4. | Organizatio | | Date: 03/28/08 | Auc | litor: Sel | vey | | |
| Element. 4.4. | .5 | I | Citle: Control of Documents | | | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| <i>documer</i> Observed procedur | nt?. d State: Reviewed the res, via the documenta | e process used in approving IH Group level, ation record within the SOP and during a pro- | SE Group level, and HP Division ocedure review meeting held on 0 | level | | | | |
| track che Observed multiple made. M | anges, margin bars, it d State: The HP and revisions. IH used at | e that changes and the current revisions staticles, or part of the document that reviews I SE documents are in Rev 0 state. The IH S and revision history in Section 10 that describedures also have the recent changes indicate | changes.) SOPs are more numerous and many libes the reason for the change, the | y have change | | | | \boxtimes |
| 3. Does the Observed | organization ensured State: The Division bution supported. The | e that relevant versions of applicable documents, SE, and IH SOPs are posted on the SHSD are BNL disclaimer is printed on each page anger, SE Manager or IH Manager as applications. | SOP web page and that is the only The official version of procedures | mechanism | | |] | \boxtimes |
| the contr JRA/FRA Some op http://ww | As and OSH document erator aids and polici | nts are available only via the web at the SHS les are posted as listed in OHSAS/WordDocs/ESHQ/SHSD/SHSD_P | SD ISM Web page. | ations.doc | | | | 1 |
| the contr JRA/FRA Some op http://ww Rev 6: L 4. How doe | As and OSH documer erator aids and polici vw.bnl.gov/esh/shsd/0 ast updated 07/19/07 as the organization en | nts are available only via the web at the SHS les are posted as listed in OHSAS/WordDocs/ESHQ/SHSD/SHSD_P | SD ISM Web page. osted_Controlled_Document_Loc eadily identifiable? | <u> </u> | | | | |

| them if they are Observed State SE and HP Man HP Manager ha IH Manager has and verified tha | them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: SE and HP Managers have not generated out of date OSH documents yet. They have obsolete stamps ready for use. HP Manager has draft versions of HP65 SOPs that are marked Obsolete. IH Manager has multiple revision and draft documents that are marked obsolete. IH did a document review in FY08 and verified that 100% of document were marked as the file copy or obsolete. PROCEDURES AND DOCUMENTATION REVIEWED: | | | | | | | \boxtimes |
|--|--|--|--|---------------------------------|------------|-------|-------------|-------------|
| | | | | | | | | |
| | | | T | | | | | |
| Organization: ESH- SHSD Date: 03/28/08 Aud | | | | ditor: Sel | vey | | | |
| Element: 4.4.6 | | | Title: Operational Control | | | | | |
| Audit question | | | Major | Minor | OFI | Meets | | |
| Does the organization have program[s] to implement: □ a) operational controls, as applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system; □ b.) controls related to purchased goods, equipment and services; □ c.) controls related to contractors and other visitors to the workplace; □ d.) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the objectives; □ e.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. | | | | | | | \boxtimes | |
| Observed State operational con conducted with listed. JRA and point, while the | trols being ned in SOPs maint I FRA add and SOP focus or | o operations are administrative and professeded. IH monitoring and some field constained at either the Division level or Groupsecond level of review of the operations, to step by step processes, and controls are processes. | sultation (such as construction review p level. Within these SOPs the contrappically focusing on hazards as the spec-requisites to conducting the steps | vs) are rols are starting | | | | |
| Observed State prompting chan fits within exist | The scheduling is ensured. | programs include the management of cled periodic review of Risk Assessment at As new equipment is purchased it is informents and SOPs. If not, then a new docu | nd SOPs is the main mechanism by vormally reviewed by the manager as tament is created. | to whether it | | | | \boxtimes |
| operational con Observed State Recently, in FY conducted with SHSD employe controls written | atrols in place: SHSD use of 706 and FY07, in the work place. SE Group on into the service. | | consulting on projects such as self a ting firm to conduct monitoring. The s, and JPM qualification) as though t | ere work is hey were | | | | \boxtimes |
| PROCEDURES ANI COMMENTS: None | | TATION REVIEWED: None | | | | | | |
| FINDING: None | | | | | | | | |
| | | | | ı | | | | |
| Organization: ESH- | SHSD | | Date: 03/28/08 | Au | ditor: Sel | vey | | |
| Element: 4.5.3 | | Title: Incident investigat | ions, Nonconformity, Corrective a | nd Preventive | Action | | | |
| Audit question | | | | Major | Minor | OFI | Meets | |
| Does the organization use their own procedure(s) for record, investigate and analyze incidents? (rely on SBMS)? SHSD uses SBMS. | | | | | | | \boxtimes | |

| of in | Is it effective to: a.) determine underlying OH& acidents; b.) identify the need for correct. b.) identify opportunities for po b.) identify opportunities for co b.) identify opportunities for co b.) communicate the results of SHSD used the BNL SBMS | tive actions; reventative action; ontinual improvement; such investigations. | night be causing or contributing to the | occurrence | | | | |
|-------|---|--|---|---------------------|------------|-------------|-----|-------------|
| 3. | Observed State: Two emplo walking to her car. Reportab SME and reported in Case#20 The other injury has just occu has been conducted, but the remodified. | le, not a DART, not a lost work day. It 007155. No actions were needed for turred and at this time it is Reportable, neeport has not been approved. Initial incustration, Professional & Office Work was | stratively reports to SHSD were injured twas investigated by SHSD Injury Mana | vestigation d to be | | | | |
| 4. | Were corrective actions or of Observed State: The employ | pportunities for preventative action dei | ace, with appropriate footwear. Weather | conditions | | | | \boxtimes |
| 5. | Observed State: SHSD uses to | dent investigation documented and ma he BNL Accident/Incident Investigation copies kept in Building 120 office 1-1. | nintained? n Report. It is entered into Compliance | Suite for | | | | \boxtimes |
| 6. | Were risk assessments condu Observed State: The inciden needed. Supervisor reported The SHSD-JRA-14 Adminis revised for other reasons in F | neted or revised as a result of incidents at report stated thee supervisor was to re the reviewed the Risk Assessment and retration, Professional & Office Work way 1907. | eview the JRA/FRA and determine if ch | on. It was | | | | \boxtimes |
| 7. | actions? | e is no SHSD procedure for walking or | for closing file drawers. No new proceed | | | | | \boxtimes |
| BNI | OCEDURES AND DOCUMEN Accident/Incident Investigativiewed: A. Van Slyke; B. Pen | NTATION REVIEWED: on Report Case#2007155. | | | | | | |
| | MMENTS: None DING: None | | | | | | | |
| | | | | | | | | |
| Org | anization: ESH- SHSD | T | Date: 03/28/08 | Au | ditor: Sel | lvey | | |
| Eler | ment: 4.5.4 | | Title: Control of Records | | | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| 1. | and disposal of records? Observed State: IH has a rec | cords management procedure IH62000 | ntification, storage, protection, retrieval Records Management & Document Ret the SBMS Records Management subject | ention. That | | | | \boxtimes |
| 2. | Observed State: IH conductor corrected problems. SE OSI records are maintained by the records storage. | H records are maintained by each SME. E SE Administrator. Most, but not all H | and found most records managed well a Worker Compensation and Accident/In Precords are well maintained. OFI: Im | ncident prove HP | | | ⊠ | |
| 3. | or loss? (Evaluate at least the Observed State: | ree record locations/owners) | ievable and protected against damage, d | eterioration | | | | |
| | Observed HP, IH and SE reco Location: IH Room 1-20 mo | ord storage as listed below: nitoring Records: all records filed adeq | uately. | | | | | \boxtimes |
| | Location: IH Room 1-26 Rep | | | | | | | |
| | Location: SE room 1-1 WC/I | ncidents records: all records filed adequ | uately. | | | | | |
| | Location: HP Records: Room | n 1-23 and 1-24: Some records not secu | ıre | | П | \boxtimes | ΙПΙ | П |

FINDING: None

| Attachment 5 | | | | | | | | |
|--|--|----------------------------------|--------------|-----------|-------------|-----|-------------|--|
| PROCEDURES AND DOCUMEN IH62000 Records Management & I | | | | | | | | |
| COMMENTS: None FINDING: | | | | | | | | |
| Minor NC: Not all HP records in R | ooms 1-23 and 1-24 are secure. | | | | | | | |
| | | | | | | | | |
| Organization: ESH-EWMS | | Date: 3/6/08 | Auc | litor: A. | Bou | | | |
| Element: 4.3.1 | Title: Planning For Hazard I | dentification, Risk Assessmen | t and Risk C | ontrol | | | | |
| Audit question Major OFI Meets | | | | | | | | |
| 1. Does the organization use a methodology of documenting risk assessment and control other than that described in SBMS OHSAS 18001 Program?NoXYes. Observed State: The JTAs, SOPs, FRA, JRAs, and the EWMS FY 08 Business Plan were all reviewed. Human Performance Training is being provided to EWMS senior managers. All supervisors/managers are required to conduct Field Safety Observations. | | | | | | | \boxtimes | |
| non routine activities; all per | Are the line organizations Risk Assessments up-to-date? Do they cover current full scope of operations; routine and non routine activities; all personnel and all facilities? Observed State: The JRAs and FRAs were not updated according to the triennial schedule. Reviews have since been | | | | | | | |
| assessments? Were they up-to- Observed State: JRAs and FF | e organization's facilities or operations that no to-dated to cover the scope of the change? AAs have not been reviewed and updated accord | ling to schedule. | | | \boxtimes | | | |
| 4. Did the organization observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Observed State: Document reviewed: JRAs and FRAs Document reviewed: Field Observation was conducted of STP field sampling activities. Document reviewed: | | | | | | | ⊠ | |
| 5. Are operational controls in p Observed State: | lace and working as specified? | | | | | | \boxtimes | |
| 6. What is the mechanism to inj Observed State: Work permit | form contractors/interested parties of relevant its, tailgate safety meeting, toolbox sessions, and | l JRAs. | to them? | | | | \boxtimes | |
| PROCEDURES AND DOCUMEN | TATION REVIEWED: FY08 Business Plan, J | ITAs, FRAs, JRAs, and SOPs. | | | | | | |
| COMMENTS: | | | | | | | | |
| FINDING (2) minor non-compliance | ces issued for failure to update and review JRA | s and FRAs. | | | | | | |
| Organization: ESH- EWMS | | Date: 3/06/08 | And | litor: A. | Rou | | | |
| Element: 4.3.3 | Title | Objectives and program(s) | Auc | ntor. A. | Dou | | | |
| | Title. | bojectives and program(s) | | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets | |
| Is there a documented freque Observed State: FY08 Busine | | | | | | | | |
| including the commitments to the organization subscribes, | le, where practicable? Are they consistent witto the prevention of injury and ill health, to con and to continual improvement? Observed State | npliance and other requirements: | nts to which | | | | \boxtimes | |
| | ented a program[s] for achieving its objectives for achieving objectives; and b.) means and b | | | | | | | |
| | 4. How are objectives made known to the employee/guests that are supposed to achieve them? | | | | | | \boxtimes | |
| PROCEDURES AND DOCUMEN FY08 EWMS Business Plan | TATION REVIEWED: | | | | | | | |
| COMMENTS: | | | | | | | | |

| Organization: ESH- EWMS Date: 3/6/08 | | | | ditor: A. | Bou | | |
|---|--|----------------------------------|---------------|-----------|-------|-----|-------------|
| Element: 4.4.4 | | Title: Documentation | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization mainted document/record: | ain OH&S management system documentatio | n for the following? Record lo | cation of the | | | | \boxtimes |
| a. Description of the scope of scope) | the OH&S management system for its organi | ization (☐ or does it fit within | the SBMS | | | | \boxtimes |
| documents (or does it fit with the | | heir interactions, and reference | e to related | | | | \boxtimes |
| c. Documents & records required by this OHSAS 18001 Standard, such as Hazard List Not updated Risk Assessments Not updated Objectives Management Reviews | | | | | | | |
| Management Reviews Documents & records necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risk Controlled Document Postings Record Storage location (or does it use Foremost only) Monitoring Records | | | | | | | \boxtimes |
| PROCEDURES AND DOCUMENTATION REVIEWED: OHSAS website was reviewed. | | | | | | | |
| COMMENTS: FINDING: (1) minor non-complian | nce. Hazards List and Risk Assessments have r | not been updated. | | | | | |
| | | | | | | | |
| Organization: ESH- EWMS | | Date: 3/6/08 | Au | ditor: A. | Bou | | |
| Element: 4.4.5 | Title | e: Control of Documents | | | | 1 | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization appro document?. Observed State: | we documents for adequacy prior to use and re | eview, update as necessary and | l re-approve | | | | |
| | e that changes and the current revisions status talics, or part of the document that reviews cha | | (example: | | | | \boxtimes |
| 3. Does the organization ensure | e that relevant versions of applicable documented Services were observed to have all applicab | | | | | | |
| 4. How does the organization e. Observed State: Documents a | nsure that documents remain legible and read are kept on-line electronically. | lily identifiable? | | | | | \boxtimes |
| 5. Are OH&S documents extern Observed State: Yes | nal origin identified and their distribution con | trolled? | | | | | |
| them if they are retained for Observed State: Documents was written on procedures. | revent the unintended use of obsolete docume any purpose (ie. Stamped "obsolete" or other were stamped as "obsolete" or "check on-line | suitable wording)? | | | | | |
| | TATION REVIEWED: and SOPs were reviewed. Interview conducted w | with C. Rooney. | | | | | |
| COMMENTS: FINDING: None | | | | | | | |
| | | | Ι | | | | |
| Organization: ESH- EWMS | | Date: 3/6/08 | Au | ditor: A. | Bou | | |
| Element: 4.4.6 | Titl | le: Operational Control | | | | | |
| Audit question | | | | Major | Minor | OFI | Meets |
| 1. Does the organization have p | program[s] to implement: | | | | | | \boxtimes |

| 2. | | | | | | | | \boxtimes |
|--|---|--|--|---------------|-----------|-------|-----|-------------|
| 3. | Observed State: Are relevant procedures and | requirements communicated to the ap | propriate suppliers and contractors (a | re | | | | |
| | operational controls in place and working as expected)? Observed State: | | | | | | | |
| | PROCEDURES AND DOCUMENTATION REVIEWED: OHSAS website | | | | | | | |
| CON | COMMENTS: | | | | | | | |
| FIN | DING: None | | | | | | | |
| Org | Organization: ESH- EWMS Date:3/6/08 Au | | | | | Bou | | |
| Elen | nent: 4.5.3 | Title: Incident investig | gations, Nonconformity, Corrective a | nd Preventive | Action | | | |
| | Audit question | | | | | Minor | OFI | Meets |
| 1. | | use their own procedure(s) for record, | investigate and analyze incidents? (_ | _Xrely | | | | \boxtimes |
| on SBMS)? 2. Is it effective to: □ a.) determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents; □ b.) identify the need for corrective actions; □ c.) identify opportunities for preventative action; □ d.) identify opportunities for continual improvement; □ e.) communicate the results of such investigations. | | | | | | | | |
| 3. | Were investigations performe Observed State: | ed in a timely manner? (Determine th | e timing of investigation[s]) | | | | | \boxtimes |
| 4. | | pportunities for preventative action det | termined? | | | | | |
| 5. | How were the results of incide Observed State: ORPS. | lent investigation documented and ma | intained? | | | | | \boxtimes |
| 6. | | cted or revised as a result of incidents | /events? | | | | | |
| 7. | Did the organization record a actions? Observed State: | any changes in their documented proc | edures resulting from corrective and p | reventative | | | | |
| | CEDURES AND DOCUMEN MMENTS: | TATION REVIEWED: | | | | | | |
| | DING: None | | | | | | | |
| Org | anization: ESH- EWMS | | Date: 3/6/08 | Aud | litor: A. | Bou | | |
| Elen | nent: 4.5.4 | | Title: Control of Records | | | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| 1. | and disposal of records? Observed State: | | ntification, storage, protection, retrieva | l, retention | | | | |
| 2. | | rds legible, identifiable and traceable? | | | | | | |
| 3. | | | evable and protected against damage, d | eterioration | | | | |
| | Location: Bldg. 860 (C. Roon | ey) | | | | | | \boxtimes |

| Attachinient | | | | | | | | <u></u> . |
|--|---|---|----------------------------------|-------------|----------|-------|-----|-------------|
| Location: B Location: | ldg. 120 (M. The | isen) | | | | | | \boxtimes |
| Location: | Location: PROCEDURES AND DOCUMENTATION REVIEWED: | | | | | | | \boxtimes |
| COMMENTS: | | | | | | | | |
| FINDING: None | | | | | | | | |
| | | | <u> </u> | T | | | | |
| Organization: ES | Organization: ESH- RCD Date: 03/17/08 Audito | | | | | | | |
| Element: 4.3.1 | Element: 4.3.1 Title: Planning For Hazard Identification, Risk Assessment and Risk Control | | | | | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| SBMS OHS | Does the organization use a methodology of documenting risk assessment and control other than that described in SBMS OHSAS 18001 Program? NoX Yes Observed State: RCD FY07 Work Scope and Self-Assessment Plan w RCD Objectives and Targets | | | | | | | X |
| non routine Observed S | activities; all per | isk Assessments up-to-date? Do they cover curresonnel and all facilities? of OHSAS audit and the Hazard list. Review fitaff. | | | | | | X |
| assessments | s? Were they up- | ne organization's facilities or operations that no to-dated to cover the scope of the change? was revised and additional controls added to add | _ | k | | | | X |
| Observed State: FS-JRA-01was revised and additional controls added to address an injury. 4. Did the organization observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Observed State: Yes Document reviewed: Document reviewed: Document reviewed: | | | | | | | | X |
| 5. Are operati | onal controls in p | place and working as specified? wes and targets in the RP Business Plan | | | | | | X |
| 6. What is the | mechanism to in | form contractors/interested parties of relevant | operational controls applying | to them? | | | | |
| | tate: Yes, RCT Ti AND DOCUMEN | raining Program VTATION REVIEWED: | | | | | | |
| COMMENTS: FINDING: | | | | | | | | |
| FINDING: | | | | | | | | |
| Organization: ES | H- RCD | | Date: 03/17/08 | Auditor: K. | Conkling | 3 | | |
| Element: 4.3.3 | | Title: C | Objectives and program(s) | | | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| Yes, establi Is there a d | shed as part of Se ocumented frequ | tives established and at what frequency? elf-Assessment Business Plan., are covered @ st ency to review status of objectives? (other than and targets in RP Business Plan. | | | | | | X |
| including the organiz Observed S practical an measurable | Observed State: Objectives and targets in RP Business Plan. 2. Are the Objectives measurable, where practicable? Are they consistent with the site level objectives, OH&S policy, including the commitments to the prevention of injury and ill health, to compliance and other requirements to which the organization subscribes, and to continual improvement? Observed State: Training of supervisors and group leaders ensure ESH involvement. Objectives are measurable and practical and are listed in the Division Business Plan. Improvement of revised subject area. All OSH goals are measurable. Also, re-training of all Supervisors. | | | | | | | X |
| responsibili be achieved Observed S (RCD Busin | | | | | | | | X |
| Observed S | tate: Performance | own to the employee/guests that are supposed to be goals for the year. I&C Calibration Facility processessment priority list. Employees are made aways | riority and status Job Risk Asse | | | | | X |

FINDING:

| PROCEDURES AND DOCUMEN | TATION REVIEWED: | | | | | | |
|---|---|-----------------------------------|---------------|----------|-------|-----|-------|
| COMMENTS: | | | | | | | |
| FINDING: | | | | | | | |
| Organization: ESH- RCD | | Date: 03/17/08 | Auditor: K. | Conkling | 3 | | |
| Element: 4.4.4 | Т | itle: Documentation | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization mainta document/record: ESHQ H | ain OH&S management system documentation omepage | n for the following? Record lo | cation of the | | | | X |
| a. Description of the <u>scope</u> of the OH&S management system for its organization (☐ or does it fit within the SBMS scope) :: RCD Management System subscribes to the FY07 Work Scope and Self-Assessment Plan (Rev. 1) | | | | | | | X |
| documents (or does it fit with th | b. Description of the main elements of the OH&S management system and their interactions, and reference to related documents (or does it fit with the SBMS Subject Area) :: See the FY 07 Work Scope and Self-Assessment Plan (Rev. 1) | | | | | | X |
| c. Documents & records required by this OHSAS 18001 Standard, such as \[\textsit Hazard List: Yes \textsit Risk Assessments: JRAs and FRAs \textsit Objective: RCD subscribes to the FY 08 RCD Business Plan \textsit Management Reviews: SBMS OHSAS | | | | | | | X |
| d. Documents & records necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risk □Controlled Document Postings: Bldg. 348, postings are up to date on main board; control Bldg. 348 Documents are up to date. □Record Storage location: Bldg. 120 □Monitoring Records: PM in Bldg. 490 | | | | | | | X |
| PROCEDURES AND DOCUMEN | TATION REVIEWED: | | | | | | |
| COMMENTS: FINDING: | | | | | | | |
| FINDING: | | | | | | | |
| Organization: ESH- RCD | | Date: 03/17/08 | Auditor: K. | Conkling | g | | |
| Element: 4.4.5 | Title | : Control of Documents | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization approved ocument?. Observed State: Yes (SOPs) | ve documents for adequacy prior to use and re | view, update as necessary and | l re-approve | | | | X |
| 2. Does the organization ensure | e that changes and the current revisions status talics, or part of the document that reviews cha | | (example: | | | | X |
| Observed State: Almost all are | e that relevant versions of applicable documen e in electronic form, exc. PM has their documen | nts in a cabinet close to the wor | | | | | X |
| Observed State: Stored in fire | - | | | | | | X |
| Observed State: RADCON 10 ANSI, etc., etc., have to have | | gulatory drivers? SBMS not tra | | | | | |
| 6. How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: Centralized web location; where most re-current documents are located; some groups control their ow files. | | | | | | | X |
| PROCEDURES AND DOCUMEN | TATION REVIEWED: | | | | | | |
| COMMENTS: | | | | | | | |

| Organization: ESH- RCD Date: 03/17/08 Auditor: K. | | | Conkling | | | | | |
|--|--|--|---------------|---------|------------|-----|-------|--|
| Element: 4.4.6 | Element: 4.4.6 Title: Operational Control | | | | | | | |
| Audit question | | | | Major | Minor | OFI | Meets | |
| Does the organization have program[s] to implement: X a) operational controls, as applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system; Building 348 interlock system X b.) controls related to purchased goods, equipment and services; X c.) controls related to contractors and other visitors to the workplace; Indoctrination program; sub-contractored RCTs X d.) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the objectives; Procedure # ADM004 on exemptions to rad requirements □ e.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. Observed State: N/A | | | | | | Х | | |
| | programs include the management of ditions and void points in the RWP prod | | | | | | X | |
| operational controls in place Observed State: Yes, in the R | CT indoctrination program | propriate suppliers and contractors (a | re | | | | X | |
| PROCEDURES AND DOCUMEN FS-SOP-4031 RWP Procedure | ITATION REVIEWED: | | | | | | | |
| COMMENTS: | | | | | | | | |
| FINDING: | | | | | | | | |
| Organization: ESH- RCD Date: 03/17/08 Auditor: K. | | | | | . Conkling | | | |
| Element: 4.5.3 | Title: Incident investig | ations, Nonconformity, Corrective a | nd Preventive | Action | | | | |
| | Audit question | | | Major | Minor | OFI | Meets | |
| Does the organization use their own procedure(s) for record, investigate and analyze incidents? (_orrely on SBMS)? All three, SBMS, RAR procedure, and Non-Conformance Subject Area | | | | | | X | | |
| of incidents; X b.) identify the need for correcti X c.) identify opportunities for pre X d.) identify opportunities for cor X e.) communicate the results of s | ventative action; atinual improvement; uch investigations. | | occurrence | | | | X | |
| | formed in a timely manner? (Determine tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is to close out RARs within 60 of the tation is the tatio | | CD home | | | | X | |
| 3. Were corrective actions or opportunities for preventative action determined? Observed State: Yes | | | | | | X | | |
| 4. How were the results of Observed State: Electronic at | f incident investigation documented an nd paper records | d maintained? | | | | | X | |
| 5. Were risk assessments conducted or revised as a result of incidents/events? Observed State: Yes, JRA-FS-01, FS Technician | | | | | | X | | |
| 6. Did the organization record any changes in their documented procedures resulting from corrective and preventative actions? Observed State: Yes, routinely | | | | | | X | | |
| PROCEDURES AND DOCUMENTATION REVIEWED: RARs, Accident Investigation Reports, Assessments. | | | | | | | | |
| COMMENTS: | | | | | | | | |
| FINDING: | | | | | | | | |
| Organization: ESH- RCD | | Date: 03/17/08 | Auditor: K. | Conklin | g | | | |
| Element: 4.5.4 | Title: Control of Records | | | | | | | |

| | Audit question | Major | Minor | OFI | Meets |
|--|---|-------|-------|-----|-------|
| 1. | Does line organization implement its own procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records? Observed State: We rely on both the SBMS and a Divisional level procedure | | | | X |
| 2. | Are organization's OSH records legible, identifiable and traceable? Observed State: Yes | | | | X |
| 3. | Are the records stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss? (Evaluate at least three record locations/owners) Observed State: Yes, records are stored and maintained by Record Custodians. | | | | X |
| | Location: Assessment Records: Bldg. 120 | | | | X |
| Location: Calibration Records: Bldg. 348 | | | | | X |
| Location: Records Storage Room Bldg. 490 | | | | | X |
| Location: | | | | | X |
| PROCEDURES AND DOCUMENTATION REVIEWED: N/A | | | | | |
| CO | MMENTS: | | | | |
| FIN | DING: | | | | |

Attachment 5 Collider Accelerator Department/SCM

| Organization: C-AD / SMD | | Date: 2/14/08 | Auditor: R. Sa | avage/ J. | Monta | lto | |
|--|--|---|-----------------|-----------|----------|-------------|-------------|
| Element: 4.3.1 Title: Planning For Hazard Identification, Risk Assessment and Risk Control | | | | | | | |
| | Title. I luming I of Truze | ara racinimenton, rasic rissessi | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization use SBMS OHSAS 18001 Pro Observed State: | a methodology of documenting risk asser gram ?No _ <u>X</u> Yes | ssment and control other than th | at described in | | | | \boxtimes |
| 2. Are the line organizations and non routine activities. | Risk Assessments up-to-date? Do they co; all personnel and all facilities? essments for 2008 are on schedule & will be | | ons; routine | | | | \boxtimes |
| 3. Have changes occurred in assessments? Were they is | the organization's facilities or operation up-to-dated to cover the scope of the chan | s that necessitated a change in the ge? | ne risk | | | | |
| Observed State: No major changes to organization that affects risk assessments. 4. Did the organization observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Observed State: All risk assessments take into account operating OPMs, work controls, admin & engineering controls when preparing these documents. Document reviewed: Document reviewed: Document reviewed: | | | | | | | |
| 5. Are operational controls i | n place and working as specified? | | | | | | \boxtimes |
| Observed State: Yes, in accordance with OPM requirements. What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? | | | | | | | |
| PROCEDURES AND DOCUMENTATION REVIEWED: OPM 2.8 | | | | | | | |
| COMMENTS: | | | | | | | |
| FINDING: | | | | | | | |
| Organization: C-AD / SMD | | Date: 2/14/08 | Auditor: R. | Savage | / J. Mor | ıtalto | |
| Element: 4.3.3 | | Title: Objectives and program | (s) | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| Are organization level Objectives established and at what frequency? Yearly Is there a documented frequency to review status of objectives? (other than SBMS) Observed State: Program defined in OPM procedures. | | | | | | | |
| 2. Are the Objectives measurable, where practicable? Are they consistent with the site level objectives, OH&S policy, including the commitments to the prevention of injury and ill health, to compliance and other requirements to which the organization subscribes, and to continual improvement? Observed State: Yearly objectives are reviewed for practicability and revised if required. | | | | ' | | | |
| Has the organization implemented a program[s] for achieving its objectives? Does it include a.) designation of responsibilities and authority for achieving objectives; and b.) means and time frame by which the objectives are to be achieved. Observed State: Yes, OPMs listed below. | | | | | | | |
| 4. How are objectives made known to the employee/guests that are supposed to achieve them? Observed State: Yes, objectives posted on C-AD web page. | | | | | | \boxtimes | |
| PROCEDURES AND DOCUMENTATION REVIEWED: OPM 1.10.4, 14.30, 1.10, 13.10.1, Self Assessment Plan. | | | | | | | |
| COMMENTS: | 1, Deli Assessiment i Idii. | | | | | | |
| FINDING: | | | | | | | |
| | 1 | | | | | | |
| Organization: C-AD / SMD | | Date: 2/14/08 | Auditor: R. Sa | vage/ I | Monta | lto | |
| | | Date. 2/14/08 | ridditor. R. Di | ivage/ o | Monta | 110 | |
| Element: 4.4.4 | | Title: Documentation | raditor. R. Se | ivage/ 5 | Wionta | | |

| Description of the spage of the OHAS A management system for its organization (E) or does if its within the SBMS | | | | | | | | |
|--|---|----------------------------------|---|--------------------|----------|-------------|-------------|-------------|
| September Secretarion of the gains of the OHAS management system for its organization Control of the main elements of the OHAS management system and their interactions, and reference to related documents Colores for wish the SBMS Subject Area (BOTTI) | | ain OH&S management system a | locumentation for the following? Reco | rd location of the | | | | |
| Sol Description of the main elements of the UHAS management system and their interactions, and reference to related | ☐a. Description of the scope of th | e OH&S management system for | r its organization ($igtigtigtigtarrow$ or does it fit with | n the SBMS | | | | \boxtimes |
| C. Documents & records required by this OHSAS 18001 Standard, such as Abstract Insert | ☑ b. Description of the main elem | | system and their interactions, and refe | rence to related | | | | \boxtimes |
| Meets Requirements | c. Documents & records required | | such as | | | | | |
| Solytechne | | | | | Ιп | | п | \boxtimes |
| Description of the processor to ensure the effective planning, operation and control of processes that relate to the management of is OHAS 768. Section 12.40 / SMD Web Pages. Description of does it use Foremost only | | Meets Requirements | | | | | | |
| Second Storage location (or does it use Foremost only) Solutioning Records Solutio | | to ensure the effective planning | , operation and control of processes th | at relate to the | | | | |
| Monitoring Records Rec | | Posted on C-AD / S | SMD Web Pages. | | П | | П | \boxtimes |
| PROCEDURES AND DOCUMENTATION REVIEWED: OPM 12, 14 series, 1104, 13.4.1, R2A2, RAFRA Listing. COMMENTS: | Record Storage location (or do | | | | | | | _ |
| Organization: C-AD / SMD Date: 2/14/08 Auditor: R. Savage/ J. Montalto Element: 4.4.5 Title: Control of Documents Audit question J. Does the organization approve documents for adequacy prior to use and review, update as necessary and re-approve document?. Observed State: 3 year review cycle. O'PM chapters found under review are tracked until completed. J. Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: O'Ms reviewed by responsible parties prior to issuance. J. Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: O'Ms reviewed by responsible parties prior to issuance. J. Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: O'Ms reviewed by responsible parties prior to issuance. J. Does the organization ensure that documents remain legible and readily identifiable? Observed State: State organization ensure that documents remain legible and readily identifiable? Observed State: State organization prevent the unintended use of obsolete documents and apply saliable identification to them if they are retained for any purpose (te. Stamped "obsolete" or other saliable wording? Observed State: Stamped on over of OPMs. Users must ensure OPMs in use agree with Web Site Directory. PROCEDURES AND DOCUMENTATION REVIEWED: OPM 1.4 series, 1.2, 10.1, 13.4.1, RA / FRA listing. Addit question J. Does the organization have program[s] to implement: J. Does the organization h | PROCEDURES AND DOCUMEN | | | | 1 | | | |
| Organization: C-AD / SMD | | , KZAZ, JKA/FKA LISHIIG. | | | | | | |
| Element: 4.4.5 Title: Control of Documents | FINDING: | | | | | | | |
| Audit question Audit question | Organization: C-AD / SMD | | Date: 2/14/08 | Auditor: R. Sa | vage/ J. | Montalt | 0 | |
| Does the organization approve documents for adequacy prior to use and review, update as necessary and re-approve document?. Observed State: 3 year review evele. OPM chapters found under review are tracked until completed. Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: OPMs reviewed by responsible parties prior to issuance. Does the organization ensure that relevant versions of applicable documents are available at points of use? Observed State: All OPMs on web site and (2) hard copies maintained in OA department and Operations Control Does the organization ensure that documents remain legible and readily identifiable? Observed State: Reviewed by administrative staff to ensure OPMs are maintained properly. A How does the organization ensure that documents remain legible and readily identifiable? Observed State: Reviewed by administrative staff to ensure OPMs are maintained properly. A How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped *obsolete* or other suitable wording)? Observed State: Stamped on cover of OPMs. Users must ensure OPMs in use agree with Web Site Directory. OPM 1.4 series, 1.2, 1.01, 13.4.1, IRA / FRA listing. COMMENTS: FINDING: Date 2/14/08 | Element: 4.4.5 | | Title: Control of Documents | | | | | |
| Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: OPMs reviewed by responsible parties prior to issuance. Does the organization ensure that relevant versions of applicable documents are available at points of use? Observed State: All OPMs on web site and (2) hard copies maintained in OA department and Operations Control Room How does the organization ensure that documents remain legible and readily identifiable? Observed State: Reviewed by administrative staff to ensure OPMs are maintained properly. Are OH&S documents external origin identified and their distribution controlled? Observed State: Seviewed by administrative staff to ensure OPMs are maintained properly. Are OH&S documents external origin identified and their distribution controlled? Observed State: Seviem 3 above, | | Audit question | on | | Major | Minor | OFI | Meets |
| Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Does the organization ensure that relevant versions of applicable documents are available at points of use? Observed State: All OPMs on web site and (2) hard copies maintained in OA department and Operations Control Room Does the organization ensure that documents remain legible and readily identifiable? Observed State: Reviewed by administrative staff to ensure OPMs are maintained properly. Does the organization ensure that documents remain legible and readily identifiable? Observed State: Reviewed by administrative staff to ensure OPMs are maintained properly. Does the Organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: Stamped on cover of OPMs. Users must ensure OPMs in use agree with Web Site Directory. Does the Organization to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Does the organization to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Does the Organization to the organization Revieweb: Does the Organization to the organization in the Stamped on cover of OPMs. Users must ensure OPMs in use agree with Web Site Directory. Does the organization to the organization in the C-AD / SMD | document?. | | | | | | | |
| 3. Does the organization ensure that relevant versions of applicable documents are available at points of use? Observed State: All OPMs on web site and (2) hard copies maintained in OA department and Operations Control Room 4. How does the organization ensure that documents remain legible and readily identifiable? Observed State: Reviewed by administrative staff to ensure OPMs are maintained properly. 5. Are OH&S documents external origin identified and their distribution controlled? Observed State: Yes, see item 3 above. 6. How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: Stamped on cover of OPMs. Users must ensure OPMs in use agree with Web Site Directory. PROCEDURES AND DOCUMENTATION REVIEWED: OPM 1.4 series, 1.2, 10.1, 13.4.1, JRA / FRA listing. COMMENTS: FINDING: Organization: C-AD / SMD Date: 2/14/08 Audit question Audit question Audit question Joerational Control Audit question Say applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system; Yes per requirements. A) operational controls into its overall OH&S management system; Yes per requirements. A) operational controls related to purchased goods, equipment and services; Purchase orders are reviewed by QA prior to issuance. C) c.) controls related to purchased goods, equipment and services; Purchase orders are reviewed by QA prior to issuance. A) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the objectives: Yes, as required. A) e.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. OSserved State: Seven minor OSHA concerns were observed (see attachment) within ERL. Issues identified and will | 2. Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) | | | | | | \boxtimes | |
| How does the organization ensure that documents remain legible and readily identifiable? Observed State: Reviewed by administrative staff to ensure OPMs are maintained properly. S. Are OH&S documents external origin identified and their distribution controlled? Observed State: Yes, see item 3 above. 6. How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: Stamped on cover of OPMs. Users must ensure OPMs in use agree with Web Site Directory. PROCEDURES AND DOCUMENTATION REVIEWED: OPM 1.4 series, 1.2, 10.1, 13.4.1, JRA / FRA listing. COMMENTS: FINDING: | 3. Does the organization ensure that relevant versions of applicable documents are available at points of use? Observed State: All OPMs on web site and (2) hard copies maintained in QA department and Operations Control | | | | | | \boxtimes | |
| Observed State: Yes, see item 3 above. 6. How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: Stamped on cover of OPMs. Users must ensure OPMs in use agree with Web Site Directory. PROCEDURES AND DOCUMENTATION REVIEWED: OPM 1.4 series, 1.2, 10.1, 13.4.1, JRA / FRA listing. COMMENTS: FINDING: Organization: C-AD / SMD Date: 2/14/08 Audit question Audit question Audit question Audit question Audit question Audit question Site of perational Control Audit question shall integrate those operational controls, as applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system; Yes per requirements. Ab) controls related to purchased goods, equipment and services; Purchase orders are reviewed by QA prior to issuance. Ac) controls related to contractors and other visitors to the workplace; In accordance with procedure. Ac) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the objectives. Yes, as required. Ac) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. Observed State: Seven minor OSHA concerns were observed (see attachment) within ERL, Issues identified and will | 4. How does the organization ensure that documents remain legible and readily identifiable? | | | | | | \boxtimes | |
| Commonstration Comm | 5. Are OH&S documents external origin identified and their distribution controlled? | | | | | | | \boxtimes |
| PROCEDURES AND DOCUMENTATION REVIEWED: OPM 1.4 series, 1.2, 10.1, 13.4.1, JRA / FRA listing. COMMENTS: FINDING: Organization: C-AD / SMD Date: 2/14/08 Auditor: R. Savage/ J. Montalto Element: 4.4.6 Title: Operational Control Audit question Audit question Jack Series, 1.2, 10.1, 13.4.1, JRA / FRA listing. Organization: C-AD / SMD Date: 2/14/08 Auditor: R. Savage/ J. Montalto Title: Operational Control Audit question Jack Series, 1.2, 10.1, 13.4.1, JRA / FRA listing. Auditor: R. Savage/ J. Montalto Title: Operational Control Audit question Jack Series, 1.2, 10.1, 13.4.1, JRA / FRA listing. Auditor: R. Savage/ J. Montalto Title: Operational Control Audit question Jack Series, 1.2, 10.1, 13.4.1, JRA / FRA listing. Auditor: R. Savage/ J. Montalto Title: Operational Control Audit question Jack Series, 1.2, 10.1, 13.4.1, JRA / FRA listing. Auditor: R. Savage/ J. Montalto Title: Operational Control Audit question Audit question Audit question Audit question Audit question Audit question Jack Series, 1.2, 10.1, 13.4.1, JRA / FRA listing. Auditor: R. Savage/ J. Montalto Title: Operational Control Audit question Audit question Audit question Find Procedure those Operational Control Audit question Audit question Audit question Audit question Audit question Find Procedure those Operational Control Audit question Audit question Audit question Audit question Find Procedure those Operational Control Audit question Audit question Audit question Find Procedure those Operational Control Audit question Audit question Find Procedure those Operational Control Audit question Audit question Audit question Find Procedure those Operational Control Audit question Audit question Find Procedure those Operational Controls Audit question Audit question Find Procedure those Operational Controls Audit question Audit question Find Procedure those Operational Controls Audit question Find Procedure those Operational Controls Audit question Find Procedure thos | 6. How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? | | | | | | | \boxtimes |
| COMMENTS: FINDING: Organization: C-AD / SMD Date: 2/14/08 Auditor: R. Savage/ J. Montalto Title: Operational Control Audit question Audi | PROCEDURES AND DOCUMEN | TATION REVIEWED: | • | | • | • | | |
| Organization: C-AD / SMD Element: 4.4.6 Title: Operational Control Audit question Auditor: R. Savage/ J. Montalto Element: 4.4.6 Auditor: R. Savage/ J. Montalto Auditor: Au | COMMENTS: | rer, rer nomg. | | | | | | |
| Audit question Audi | FINDING: | | | | | | | |
| Audit question Audit question | | | Date:2/14/08 | Auditor: R. Sa | vage/ J. | Montalt | 0 | |
| Does the organization have program[s] to implement: | Element: 4.4.6 | | Title: Operational Control | | | | | |
| | | Audit question | on | | Major | Minor | OFI | Meets |
| operational controls into its overall OH&S management system; Yes per requirements. □ b.) controls related to purchased goods, equipment and services; Purchase orders are reviewed by QA prior to issuance. □ c.) controls related to contractors and other visitors to the workplace; In accordance with procedure. □ d.) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the objectives; Yes, as required. □ e.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. □ observed State: Seven minor OSHA concerns were observed (see attachment) within ERL. Issues identified and will | | | and its activities: the organization shall | intagrata thosa | | | | |
| Purchase orders are reviewed by QA prior to issuance. C.) controls related to contractors and other visitors to the workplace; In accordance with procedure. A.) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the objectives; Yes, as required. A.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. Observed State: Seven minor OSHA concerns were observed (see attachment) within ERL. Issues identified and will | operational controls into its overall OH&S management system; Yes per requirements. | | | | | | | |
| In accordance with procedure. | | | | | | | | |
| ⊠ d.) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the objectives; Yes, as required. ⊘ e.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. Observed State: Seven minor OSHA concerns were observed (see attachment) within ERL. Issues identified and will | ☑ c.) controls related to contractors and other visitors to the workplace; | | | | | \boxtimes | | |
| ☑ e.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the objectives. Observed State: Seven minor OSHA concerns were observed (see attachment) within ERL. Issues identified and will | ☑ d.) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the | | | | 1 | | | _ |
| Observed State: Seven minor OSHA concerns were observed (see attachment) within ERL. Issues identified and will | 🗵 e.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the | | | | | | | |
| na trackad in A LN until corrected | Observed State: Seven minor OSHA concerns were observed (see attachment) within ERL. Issues identified and will | | | | - | | | |

| | programs include the management of ce with SBMS Subject Area requirement | | | | | | \boxtimes |
|---|--|--------------------------------------|---------------------|----------|---------|-------------|-------------|
| operational controls in place | requirements communicated to the ap and working as expected)? ck controls subject area requirements. | ppropriate suppliers and contract | ors (are | | | | |
| PROCEDURES AND DOCUMEN SBMS work controls subject area, (| TATION REVIEWED: OPM 2, 8 & 13 series, Risk Analysis F | Records | | | I | | |
| COMMENTS: | | | | | | | |
| FINDING: See Above. | | | | | | | |
| Organization: C-AD / SMD | | Date: 2/14/08 | Auditor: R. Sa | vage/ J. | Montalt | 0 | |
| Element: 4.5.3 | Title: Incident investi | gations, Nonconformity, Correct | tive and Preventive | Action | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization use the SBMS)? | eir own procedure(s) for record, inves | stigate and analyze incidents?(| X_rely on | | | | \boxtimes |
| 2. Is it effective to: | eventative action; ontinual improvement; such investigations. | | to the occurrence | | | | |
| 3. Were investigations performed Observed State: Yes as scheme | ed in a timely manner? (Determine the duled. | he timing of investigation[s]) | | | | | \boxtimes |
| | pportunities for preventative action de | termined? | | | | | \boxtimes |
| 5. How were the results of incident investigation documented and maintained? Observed State: Yes as required by ESHQ personnel. | | | | | | \boxtimes | |
| 6. Were risk assessments conducted or revised as a result of incidents/events? Observed State: Not in 2008. | | | | | | \boxtimes | |
| 7. Did the organization record any changes in their documented procedures resulting from corrective and preventative actions? Observed State: Yes as required by OPM | | | | | | | \boxtimes |
| PROCEDURES AND DOCUMEN C-AD OPM 9.4.1, 9.4.5, 10.1, SMI | ITATION REVIEWED: | | | | | | |
| COMMENTS: FINDING: | | | | | | | |
| TINDING. | | | | | | | |
| Organization: C-AD / SMD | | Date: 2/14/08 | Auditor: R. S | avage/ J | . Monta | lto | |
| Element: 4.5.4 | | Title: Control of Records | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| and disposal of records? Observed State: Yes see belo | ment its own procedure(s) for the ide | ntification, storage, protection, re | trieval, retention | | | | |
| 2. Are organization's OSH recor Observed State: Yes as requi | rds legible, identifiable and traceable? | | | | | | \boxtimes |
| Are the records stored and ma or loss? (Evaluate at least thr Observed State: Yes as requi | aintained such that they are readily retree record locations/owners) red. | ievable and protected against dam | age, deterioration | | | | \boxtimes |
| Location: 1 st & 2 nd floor of C-AD Bldg. 911A. | | | | | | | \boxtimes |
| Location: 2 nd floor of SMD Bldg. 902. | | | | | | | |
| Location: | | | | | | | |
| PROCEDURES AND DOCUMEN | ITATION REVIEWED: 1.1, 13.4.2, SBMS Subject Area, SMD | 1.2. | | | | | |
| FINDING: | | | | | | | |

Attachment 6 Facility & Operations Department

| Organization: Facilities & Operations Directorate Date: March 08 Auditor: Richard DeRocher | | |
|--|---------|--|
| Element: 4.3.1 Title: Planning For Hazard Identification, Risk Assessment and Risk Control | | |
| Audit question Audit question | Meets | |
| Observed State: Not applicable. | | |
| Observed State: 283 of 288 Risk Assessments were reviewed on time. The remaining 5 are currently being reviewed. See OFI 1. | | |
| 3. Have changes occurred in the organization's facilities or operations that necessitated a change in the risk assessments? Were they up dated to cover the scope of the change? | | |
| Document reviewed: EP-ES&H-102, Electrical Safety Procedure Document reviewed: EP-ES&H-211, Blood Bourne Pathogens Procedure | | |
| 5. Are operational controls in place and working as specified? Observed State: Yes, examples include Job Site Tier 1 Inspections, Stop Observations, SOPs, LOTO, and Work Planning. | | |
| 6. What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? Observed State: Work Permits, Contract Documents, Contractor / vendor Orientation | | |
| PROCEDURES AND DOCUMENTATION REVIEWED: EP-ES&H-102, Electrical Safety Procedure, EP-ES&H-211, Blood Bourne Pathogens Procedure, Job and Facility Risk Assessments | | |
| COMMENTS: | | |
| Corrective Actions are generated and e-mailed to individuals to review risk assessments. FINDING: See OFI 1. | | |
| | | |
| Organization: Facilities & Operations Directorate Date: March 08 Auditor: Richard DeRocher | | |
| Element: 4.3.3 Title: Objectives and program(s) | | |
| Audit question Audit question | Meets | |
| 1. Are organization level Objectives established and at what frequency? Is there a documented frequency to review status of objectives? (Other than SBMS) Observed State: Yes, F&0 objectives are reviewed annually. | | |
| 2. Are the Objectives measurable, where practicable? Are they consistent with the site level objectives, OH&S policy, including the commitments to the prevention of injury and ill health, to compliance and other requirements to which the organization subscribes, and to continual improvement? Observed State: Yes. | | |
| Observed State: Yes, F&O ESH Program Description. | | |
| 4. How are objectives made known to the employee/guests that are supposed to achieve them? Observed State: Objectives are communicated by F&O Environment, Safety & Health Management System and Self-Assessment Program Website, e-mail, Safety Information Bulletins, F&O Safety Management Plan FY 2008, and group | | |
| meetings. | | |
| | Plan FY | |

| Organization: Facilities & Operation | ns Directorate | Date: March 08 | Auditor: 1 | Richard 1 | DeRoche | er | | |
|--|--|--|---------------|-----------|---------|-----|-------------|--|
| Element: 4.4.4 | | Title: Documentation | | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets | |
| Does the organization maintal document/record: | in OH&S management system documento | ation for the following? Record lo | cation of the | | | | | |
| scope) | e OH&S management system for its organ d Self-Assessment Program Website | sization (□ or does it fit within the | SBMS | | | | | |
| ⋈ b. Description of the main elem documents (or does it fit with th | ents of the OH&S management system an | d their interactions, and reference | to related | | | | \boxtimes | |
| c. Documents & records required by Hazard List F&O ESH Skisk Assessments F&O ESH Dipertives F&O ESH | by this OHSAS 18001 Standard, such as I Management System and Self-Assessmen | at Program Website at Program Website | | | | | \boxtimes | |
| management of its OH&S risk ☐ Controlled Document Postings ☐ Record Storage location ☐ Monitoring Records | Building 185 - Room 9A Building 185 - Room 9A | • • | ate to the | | | | \boxtimes | |
| PROCEDURES AND DOCUMENTATION REVIEWED: F&O ESH Management System Description, F&O ESH Management System and Self-Assessment Program Website, F&O Procedures & SOP Information Website COMMENTS: | | | | | | | | |
| FINDING: None. | | | | | | | | |
| | | | | | | | | |
| Organization: Facilities & Operations Directorate Date: March 08 Auditor: Richard DeRocher | | | | | | | | |
| Element: 4.4.5 Title: Control of Documents | | | | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets | |
| document? Observed State: Yes, each document | the documents for adequacy prior to use an ant revision is approved before use. The F& ument reviews are scheduled every 3 years | O Corrective Action Tracking Syst | | | | | | |
| track changes, margin bars, it | that changes and the current revisions sta- alics, or part of the document that reviews are used to identify the sections of documen | changes.) | (example: | | | | | |
| 3. Does the organization ensure Observed State: The current revision | that relevant versions of applicable documents of OHSAS documents are available on A few paper copies of procedures are issue. | ments are available at points of use the Safety & Health Management S | System and | | | | \boxtimes | |
| 4. How does the organization en | nsure that documents remain legible and r sed documents ensures that documents rem | | | | | | | |
| | al origin identified and their distribution of external origin are required to maint | | eir | | | | | |
| 6. How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: The use of a disclaimer on documents stating that the electronic copy on the web is latest copy prevents the | | | | | | | \boxtimes | |
| unintended use of obsolete documents. When paper copies are revised, the superceded documents are removed from use. PROCEDURES AND DOCUMENTATION REVIEWED: F&OP-MGMT-100, Facility & Operations Procedures, Internal Controlled Document Subject Area | | | | I | 1 | I | | |
| COMMENTS: | | | | | | | | |
| FINDING: None. | | | | | | | | |
| Organization: Facilities & Operation | ns Directorate | Date: March 08 | Auditor: 1 | Richard 1 | DeRoche | er | | |
| Element: 4.4.6 | | Title: Operational Control | | | | | | |

| | Audit question | | | | Minor | OFI | Meets |
|--|---|---|-----------------------------|-----------|---------|------|-------------|
| operational controls into its overal | licable to the organization and its activities; If OH&S management system; and goods, equipment and services; ors and other visitors to the workplace; ons where the absence could lead to deviation where their absence could lead to deviation equirements and controls contained in the Slecific activities. | ons from the OH&S policy and the ons from the OSH policy and the object of the 5 Divi | e objectives; bjectives. | | | | |
| | programs include the management of chard by the requirements management process, program. | | procedures, | | | | |
| 3. Are relevant procedures and requirements communicated to the appropriate suppliers and contractors (are operational controls in place and working as expected)? Observed State: BNL requirements are communicated to suppliers and contractors through purchase orders, Contractor vendor orientation, and the work control program. PROCEDURES AND DOCUMENTATION REVIEWED: | | | | | | | |
| COMMENTS: | | | | | | | |
| FINDING: None. | | | | | | | |
| O | Discotomet | Deter Menel 00 | A 1:4 T | 0:-14 1 | D - Dl- | | |
| Organization: Facilities & Operation Element: 4.5.3 | | Date: March 08 | Auditor: I | | Dekocn | er | |
| Element. How | Title: Incident investigation | ns, Nonconformity, Corrective a | ia Preventive | | | | |
| Audit question | | | | Major | Minor | OFI | Meets |
| 1. Does the organization v SBMS)? | use their own procedure(s) for record, inves | tigate and analyze incidents? (| rely on | | | | |
| 2. Is it effective to: | | | | | | | |
| | formed in a timely manner? (Determine th | ne timing of investigation[s]) | | | | | \boxtimes |
| | or opportunities for preventative action de | termined? | | | | | |
| 5. How were the results of Observed State: Yes. | fincident investigation documented and ma | uintained? | | | | | |
| | conducted or revised as a result of incidents | s/events? | | | | | \boxtimes |
| 7. Did the organization re preventative actions? Observed State: Yes. CA 9128, Revise JRA-EF | cord any changes in their documented procedures P-Construction, ECS Field Work ue Emergency Services procedures Checklist | redures resulting from corrective | and | | | | |
| PROCEDURES AND DOCUMEN F&O Corrective Action Database | | | | | | I | |
| COMMENTS: | | | | | | | |
| FINDING: None. | | | | | | | |
| Organization: Facilities & Operation | ons Directorate | Date: March 08 | Audito | r: Richai | rd DeRo | cher | |
| Element: 4.5.4 | | Title: Control of Records | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| and disposal of records? Observed State: No, F&O records a | | | | | | | |

| Are organization's OSH records legible, identifiable and traceable? Observed State: Yes | | | | \boxtimes | | |
|---|-----------|---------|----------|-------------|--|--|
| Observed state. 1 es. | _ | | | | | |
| Are the records stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss? (Evaluate at least three record locations/owners) | | П | | M | | |
| Observed State: The controlled copy of OHSAS records are maintained on the F&O ESH Management System and Self- | | | | | | |
| Assessment Program Website. Paper records are maintained in Room 9A of Building 185. | | | | | | |
| Location: F&O ESHT&Q Group - Room 9A of Building 185 | | | | \square | | |
| Verified that JRAs, FRAs, and the F&O ESH Program Description | | Ш | | | | |
| PROCEDURES AND DOCUMENTATION REVIEWED: | | | | | | |
| Job Risk Assessments, Facility Risk Assessments, F&O ESH Program Description, FY08 ESH Targets and Objectives, Managem | ent Revie | ew Docu | mentatio | n, and | | |
| FY07 ESH External Assessment. | | | | | | |
| COMMENTS: | | | | | | |
| Current copies of all OHS records are maintained on the F&O ESH Management System and Self-Assessment Program Website. | | | | | | |
| FINDING: OFI 3 – Section 4.5.5, "Records and Records Management," of the F&O ESH Program Description needs to be revised to reflect current records | | | | | | |
| management practices. | | | | | | |
| OFI 4 - BNL Records Management Record Folder No. DF8169, OHSAS 18001 Program Registration Documents, need to be revised to reflect current records | | | | | | |
| management practices (change to an electronic record) | | | | | | |

AUDIT REPORT

- 1.0 Purpose: This assessment was conducted to evaluate the implementation of the OHSAS 18001 2007 requirements. The assessment was performed at the request of the Safety and Health Services Division.
- 2.0 Scope: Implementation of the OHSAS 18001 2007 requirements were evaluated in March of 2008. The assessment was conducted in accordance with the requirements of an assessment plan (see Attachment 1) and an assessment checklist (see Attachment 2). Individuals were interviewed (see Attachment 3), and documentation associated with the implementation of the SA was reviewed.
- 3.0 Summary: This assessment determined that the F&O Directorate's implementation of OHSAS 18001 2007 requirements is satisfactory. No Findings were identified. Four Opportunities for Improvement, which are statements of fact that could lead to nonconformances. Details are provided below:
- 4.0 Findings: None.
- 5.0 Opportunities for Improvement (OFI)
 - OFI 1: Several Risk Assessments are past their scheduled review date. They are in the process of being updated. However, 283 of 288 were completed on time.
 - 5.2 OFI 2: Employee knowledge of ESSH Policy requirements, plaque locations, and how to find the policy on the web needs improvement.
 - 5.3 OFI 3: Section 4.5.5, "Records and Records Management," of the F&O ESH Program Description needs to be revised to reflect current records management practices.
 - 5.4 OFI 4: BNL Records Management and Record Folder No. DF8169, OHSAS 18001 Program Registration Documents, need to be revised to reflect current records management practices (change to electronic an record).
- 6.0 Recommended Actions:

The results of the assessment were reviewed with the F&O OSH Representative. The following actions will be taken to address the Opportunities for Improvement identified in this assessment:

- OFI 1: F&O ESHT&Q Manager needs to place more attention on ensuring all risk assessments are reviewed prior to their expiration dates. (No formal corrective action required.
- OFI 2: A safety tool box will be generated and sent to F&O Supervisors to discuss the ESSH Policy, plaque locations, and how to access the policy from a computer. A Corrective Action will be assigned to the QA Coordinator.
- OFI 3: Revise F&O ESH Program Description to reflect current record Management practices. A Corrective Action will be assigned to the OA Coordinator.
- OFI 4: Revise record folder DF8169 to reflect current record management practices. A Corrective Action will be assigned to the QA Coordinator.

Completion of the actions identified by this assessment will be tracked in the F&O Corrective Action Tracking System.

- 7.0 Attachments:
 - Assessment Plan
 - 2. Assessment Checklist
 - 3. List of Personnel Contacted
 - 4. Documents Reviewed

ATTACHMENT 1 - AUDIT PLAN

- 1. Purpose: The purpose of this audit is to evaluate the implementation and effectiveness of the OHSAS 18001 requirements.
- 2. Scope: OHSAS 18001 Elements 4.1, 4.2, 4.3.1, 4.3.3, 4.4.3, 4.4.4, 4.4.5, 4.4.6, 4.4.7, 4.5.3, 4.5.4, and 4.6 will be reviewed with F&O Directorate and Procurement and Property Management Division personnel to evaluate the implementation and effectiveness of the OHSAS 18001 requirements.
- .3. Audit Personnel: Richard DeRocher

- Attachment 5
 - 4. Personnel To Be Contacted: F&O & PPM Individuals that are responsible for implementing OHSAS 18001 requirements will be contacted during this assessment.
 - 5. Assessment Activities, Requirements, and Documents:
 - Use the audit checklist to conduct the assessment.
 - Interview personnel, review records, and conduct field reviews to determine if requirements are effectively implemented.
 - Discuss the results of the audit with the F&O OSH Representative.
 - Prepare and issue the final assessment report to the Manager of the F&O ESHT&Q Group and the Safety and Health Services OSH Point of Contact.

ATTACHMENT 2 – AUDIT CHECKLIST

ATTACHMENT 3 - LIST OF PERSONNEL CONTACTED

ORGANIZATION NAME Costa, R. F&O OSH Representative F&O ES&H Coordinators Bender, P. Houvener, N. F&O ES&H Coordinators Martino, P. F&O ES&H Coordinators Pfeiffer, D. Staff Specialist Walsh, D. Safeguards & Security Timm, M. Safeguards & Security Kelly, T. **Emergency Services** Levesque, J. **Emergency Services** Seibel, R. Central Fabrication Lambertson, T Central Fabrication Selvey R. Safety and Health Services

ATTACHMENT 4 - LIST OF DOCUMENTS REVIEWED

BNL ESSH Policy

EP-ES&H-102, Electrical Safety Procedure EP-ES&H-102, Electrical Safety Procedure

EP-ES&H-211, Blood Bourne Pathogens Procedure EP-ES&H-211, Blood Bourne Pathogens Procedure

ES&H Committee Meeting Minutes

F&O Corrective Action Database

F&O ESH Management System and Self-Assessment Program

Website

F&O ESHTQ-GS-110: Employee Environmental, Safety, and Health

Concerns

F&O FY 08 Business Plan

F&O Procedures & SOP Information Website

F&O Safety Management Plan FY 2008

F&OP-MGMT-100, Facility & Operations Procedures

Facility Risk Assessments

Flash Reports

FY 08 Targets and Objectives with status

Job Risk Assessments

Management Review Minutes

Management Review PowerPoint Presentation from 10/18/2007

Management Review Record of Decision

SBMS Internal Controlled Document Subject Area

Town Hall Meeting Presentations

Attachment 5 Life Sciences Directorate

| Organization: Life Sciences | | Date: 3/17/08 | Aud | Auditor: Emrick | | | |
|--|--|--------------------------------|---------------|-----------------|------------|-------------|-------------|
| Element: 4.3.1 | Title: Planning For Hazard I | dentification, Risk Assessmen | t and Risk C | ontrol | | | |
| | Audit question | | | Major | Mino r | OFI | Meets |
| SBMS OHSAS 18001 Progra Observed State: ESRs, WPs, | methodology of documenting risk assessment of the state o | ecently been incorporated into | | | | | |
| Are the line organizations Risk Assessments up-to-date? Do they cover current full scope of operations; routine and non routine activities; all personnel and all facilities? Observed State: JRAs and FRAs are required to be updated at least every 3yrs. Life Sciences has a revision scheduled posted on the website. FY08 scheduled JRAs are in process. About 1/3 have been revised to date. Goal is end of FY. OFIIncorporation of JRAs into ESRs will ensure that all activities have been assessed. This should happen as part of the ESR update (electronic ESR process should facilitate) OFISite wide should consider using cross cutting multi-directorate teams for updating JRAs and/or rolling up into Subject Areas. Have changes occurred in the organization's facilities or operations that necessitated a change in the risk | | | | | | \boxtimes | |
| assessments? Were they up- | te organization's facilities or operations that no to-dated to cover the scope of the change? in operations that would necessitate new JRAs | _ | k | | | | \boxtimes |
| 4. Did the organization observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Observed State: This is incorporated into the WPC system. ESRs have been revised to specify hierarchy. Document reviewed: See revised Subject Area. Document reviewed: ESR-MO-Thanos—not specifically discussed but incorporated into controls and a section on substitution is included. Will improve this with new format. Document reviewed: | | | | | | | |
| Are operational controls in place and working as specified? Observed State: Reviewed machine shop in 421 and experimental work in 490 under MO-Thanos1. Training for staff working was up to date, postings were up to date. PPE needs to be more specific in ESR (OFI) | | | ing for staff | | | \boxtimes | |
| 6. What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? Observed State: Work Planning and control. A WCC reviews work (or ESRC). | | | to them? | | | | \boxtimes |
| | ITATION REVIEWED: See above | | | | | | |
| process should facilitate) | ESRs will ensure that all activities have been as ing cross cutting multi-directorate teams for upon ific in ESR (OFI) | | | _ | e (electro | onic ESR | 8 |
| Organization: Life Sciences | | Date: 3/17/08 | Auc | ditor: En | nrick | | |
| Element: 4.3.3 | Title: (| Objectives and program(s) | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| Is there a documented freque | tives established and at what frequency? ency to review status of objectives? (other than re established annually as required and revised | | | | | | \boxtimes |
| Are the Objectives measurable, where practicable? Are they consistent with the site level objectives, OH&S policy, including the commitments to the prevention of injury and ill health, to compliance and other requirements to which the organization subscribes, and to continual improvement? Observed State: They flow down from OSH priorities and from Directorate assessment results or feedback from management review. Example: OSHA particularly haz substance focus. | | | nts to which | | | | \boxtimes |
| responsibilities and authority be achieved. | nented a program[s] for achieving its objectives of or achieving objectives; and b.) means and a esciences Self Assessment Plan 08 | | | | | | |

| Observed State: They are communicated. | to the employee/guests that are supposed to achieve them? unicated to affected staff as appropriate. All hands meetings, emails and newsletters See 2/08 newsletter on S2, Tier Is | | | | |
|---|---|-------------|------------|-------------|-------------|
| PROCEDURES AND DOCUMENTAT | TION REVIEWED: See above | | | | |
| COMMENTS: None—see above FINDING: None | | | | | |
| TIVELIVE. IVINC | | | | | |
| Organization: Life Sciences | Date: 3/18/08 Auc | litor: En | rick | | |
| Element: 4.4.4 | | ittor. En | IIICK | | |
| Element. 4.4.4 | Title: Documentation | | | | |
| | Audit question | Major | Minor | OFI | Meets |
| 1. Does the organization maintain C document/record: OHSAS POC (i | OH&S management system documentation for the following? Record location of the inventoried in Records system). | | | | \boxtimes |
| scope) | H&S management system for its organization (☐ or does it fit within the SBMS | | | \boxtimes | |
| OFI—remove management system descri | | | | | |
| documents (or does it fit with the SB | | | | | |
| | is OHSAS 18001 Standard, such as s created for Management review and the JRAs/FRAs list identifies hazards should be linked to from the Life Sciences OHSAS website. | | | | |
| d. Documents & records necessary to emanagement of its OH&S risk Controlled Document Postings Record Storage location (or does it Monitoring Records − Rely on Con | | | | \boxtimes | |
| PROCEDURES AND DOCUMENTAT | TION REVIEWED: See above | | | | |
| COMMENTS: Questioned Selvey and Peters on the req JRA/FRA lists. Decided on an OFI | quirement for a hazard list. We seem to have it covered under the Management Review | v slide or | n OSH h | azards aı | nd the |
| | nt system description and replace with SBMS only. t is created for Management review and the JRAs/FRAs list identifies hazards howeve tices OHSAS website. | er there is | s a site w | vide list v | which |
| | | | | | |
| Organization: Life Sciences | Date: 3/18/08 Aud | litor: En | nrick | | |
| Element: 4.4.5 | Title: Control of Documents | | | | |
| | Audit question | Major | Minor | OFI | Meets |
| 1. Does the organization approve do | ocuments for adequacy prior to use and review, update as necessary and re-approve | | | | |
| document?. Observed State: Yes – reviewed rand objectives. | management system description, a sampling of ESRs, Self Assessment plan w/goals | | | | \boxtimes |
| track changes, margin bars, italics Observed State: Current revision status is identified by | t changes and the current revisions status of documents are identified? (example: s, or part of the document that reviews changes.) version or date as per subject area. A revision (change) history is in process of documents are updated. Worst case is that a person would have to compare the two | | | | |
| 3. Does the organization ensure that | t relevant versions of applicable documents are available at points of use? rator aids were visible in shops, labs. | | | | \boxtimes |
| 4. How does the organization ensure | e that documents remain legible and readily identifiable? | | | | |
| Observed State: | | | | ΙШ | \boxtimes |
| Tier Is, records management, asses | | | | | |
| | rigin identified and their distribution controlled? | | | | |
| 5. Are OH&S documents external of Observed State: SHSD maintains documents on mo 6. How does the organization prevent | onitoring and test equipment. In the unintended use of obsolete documents and apply suitable identification to purpose (ie. Stamped "obsolete" or other suitable wording)? | | | | |

COMMENTS: May need to take a closer look at documents of external origin to see what exactly they are looking for. All safety related equipment manuals are maintained in ESH Dir.

FINDING: OFI in process is the tracking of changes on documents (see JRAs/FRAs revised in 08).

| Organization: Life Sciences | | Date: 3/18/08 | Aud | litor: En | nrick | | |
|---|--|--|---------------|-----------|----------|-------------|-------------|
| Element: 4.4.6 | | Title: Operational Control | | | | | |
| | Audit question | - | | Major | Minor | OFI | Meets |
| 1. Does the organization have p | rogram[s] to implement: | | | | | | |
| | s applicable to the organization and its a overall OH&S management system; | ctivities; the organization shall integr | rate those | | | | |
| | chased goods, equipment and services; | | | | | | |
| | tractors and other visitors to the workpla tuations where the absence could lead to | | d the | | | | |
| | iteria where their absence could lead to d | deviations from the OSH policy and t | he | | | | |
| Observed State: | er specify PPE in the work planning docu | uments (replace "PPE as required" a | and "as | | | | |
| 2. How do organization OH&S Observed State: Operational | programs include the management of che controls are re-evaluated at minimum and MS changes they are evaluated. | | anges in | | | | \boxtimes |
| Are relevant procedures and requirements communicated to the appropriate suppliers and contractors (are operational controls in place and working as expected)? Observed State: ISM flowdown in webreq system covers this. WCC communicate requirements to contractors or they are covered under and ESR> | | | | | | | \boxtimes |
| PROCEDURES AND DOCUMEN | | | | | • | | |
| COMMENTS: ESRs will benefit fr | om the details of specific PPE. | | | | | | |
| FINDING: | | | | | | | |
| Organization: Life Sciences | | Date 3/18/08 | A 116 | ditor: Em | rick | | |
| <u> </u> | | | | | IIICK | | |
| Element: 4.5.3 | Title: Incident investigat | ions, Nonconformity, Corrective and | d Preventive | Action | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| on SBMS)? | use their own procedure(s) for record, inv | vestigate and analyze incidents? (| Xrely | | | | |
| of incidents; | S deficiencies and other factors that mig | ht be causing or contributing to the o | occurrence | | |] | |
| □ b.) identify the need for correct □ c.) identify opportunities for pro □ d.) identify opportunities for co | eventative action; ntinual improvement; | | | | | | |
| | formed in a timely manner? (Determine abject area on events/issues/ORPS | the timing of investigation[s]) | | | | | |
| | or opportunities for preventative action | determined? | | | | | |
| | fincident investigation documented and i | maintained? | | | | | |
| 6. Were risk assessments of Observed State: OFI as a result of an SMF ov | conducted or revised as a result of incide er exposure and some waste management | issues those JRAs should be revisited | | | | \boxtimes | |
| preventative actions? Observed State: | cord any changes in their documented pr | rocedures resulting from corrective a | nd | | | | \boxtimes |
| | PROCEDURES AND DOCUMENTATION REVIEWED: | | | | | | |
| area covers the corrective and preve | | | | | ports. T | The subje | ect |
| I FINDING: OFI as a result of a SMI | F over exposure and some waste managen | nent issues those IR As should be revise | sited in FV09 | 2 | | | |

Final Rev0 04/22/08

| Organization: Life Sciences | | Date: 3/18/08 | Auditor: Emrick | | | | |
|---|--|--|-----------------|-------|-------|-----|-------------|
| Element: 4.5.4 | | Title: Control of Records | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| and disposal of records? Observed State: | | ification, storage, protection, retrieval, | retention | | | | |
| 2. Are organization's OSH record Observed State: | rds legible, identifiable and traceable? | | | | | | \boxtimes |
| Are the records stored and ma or loss? (Evaluate at least thr Observed State: | , | ievable and protected against damage, d | eterioration | | | | \boxtimes |
| Location: Tier I records | | | | | | | |
| Location: JRAs/FRAs Location: 801 SOPs Location: ESRs | | | | | | | |
| PROCEDURES AND DOCUMENTATION REVIEWED: | | | | | | | |
| | fied and managed in the Foremost Syst | em. | | | • | • | |
| FINDING: None | | | | | | | |

Attachment 5 NSLS

| Organization: NSLS Date: 3/30/08 Auditor: M. Buckley | | | | | | | |
|--|---|---|--------------|-----------|--------|-----|-------|
| Element: 4.3.1 | Title: Planning For Hazard I o | dentification, Risk Assessmen | t and Risk C | ontrol | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| SBMS OHSAS 18001 Program? X_No Yes. If Yes, does the system take into account: a.) routine and non-routine activities; Yes - NSLS has completed JRAs and FRAs for routine and non-routine activities. A list of these activities is located on the NSLS website for all staff to access. b.) activities of all personnel having access to the workplace (including contractors and visitors); Yes - In addition to BNL Personnel, contractors and users were considered during the evaluation. In some of the JRAs, users were invited to participate in the review. Contractors and vendors are managed through the NSLS Guest Administrator with use of the NSLS Contractor/Vendor Orientation Form. c.) human behavior, capabilities and other human factors- Yes. ;d.) identified hazards origination outside the workplace capable of adversely affecting the health and safety of persons under the control of the organization within the workplace; Yes- Lessons learned from other facilities are considered, if applicable. e.) hazards created in the vicinity of the workplace by work-related activities under the control of the organization - Yes.; f.) infrastructure, equipment and materials at the workplace, whether provided by the organization or others - Yes.; g.) changes or proposed changes in the organization, its activities or material; Yes - A checklist is used for design and beamline safety reviews that addresses changes to JRSs/FRAs. If an incident occurs applicable JRA/FRAs are reviewed as well as procedures. h.) modifications to the OH&S management system, including temporary changes, and their impacts on operations, processes, and activities. Yes - See response to "g" above.; i.) any legal obligations relating to risk assessments and implementation of necessary controls; Yes - Regulations are considered when identifying needed controls. j.) the design of work areas, processes, installations, machinery/equipment, operating procedures and work organization, including their adoption to human capabilities. Yes - JRAs are used to determine if spe | | | | | | | |
| Are the line organizations Risk Assessments up-to-date? Do they cover current full scope of operations; routine and non routine activities; all personnel and all facilities? Observed State: Yes – The JRAs and FRAs are up to date. They address a full scope of NSLS operations, routine and non routine activities, and include NSLS personnel and facilities. | | | | | | | |
| Yes – For example the Walkin | e organization's facilities or operations that nec ng JRA (LS-JRA-0038) was reviewed and upda scope of the change? They were either reviewe | ated as the result of two inciden | | | | | |
| and/or administrative control and other planning document. Observed State: Document reviewed: We Document reviewed: Ele Document reviewed: Ele | ork with Cooling Water Systems (LS-JRA-0012 ectrical & Electronic shop Work (LS-JRA-0001 evated Work (LS-JRA-0035) | ermining controls within risks a. 2) | | | | | |
| Are operational controls in pl Observed State: | ace and working as specified? Yes | | | | | | |
| 6. What is the mechanism to info Work Planning and Control p Observed State: | orm contractors/interested parties of relevant of rocess and NSLS Contractor/Vendor Orientation | | them? | | | | |
| PROCEDURES AND DOCUMEN NSLS OHSAS Management Syster Various NSLS JRAs and FRAs | | | | | | | |
| COMMENTS: See Above. | | | | | | | |
| FINDING: None | | | | | | | |
| Organization: NSLS | | Date: 3/30/ | Audite | or: M. Bu | ıckley | | |
| Element: 4.3.3 | Title: (| Objectives and program(s) | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |

| established and are developed Is there a documented freque Observed State: The OHS O established annually as a part reviewed and re-established a | tives established and at what frequency? Yes - NSLS department objectives have been an annual basis. NSLS objectives are located in the NSLS ESH Improvement in the notation of the notation o | Plan. re es are | | | | |
|---|--|-----------------------|-----------|---------|------|-------|
| policy, including the commitment which the organization subsc | le, where practicable? Yes. Are they consistent with the site level objectives, OH&S ments to the prevention of injury and ill health, to compliance and other requirement ribes, and to continual improvement? Yes SH Objectives address Human Performance, and Accident and Injury Prevention as | s to | | | | |
| 3. Has the organization implemented a program[s] for achieving its objectives? Yes. Does it include a.) designation of responsibilities and authority for achieving objectives; and b.) means and time frame by which the objectives are to be achieved. Yes each is captured in the NSLS ESH Improvement Plan. These objectives are tracked and monitored in the NSLS Family ATS System. Observed State: | | | | | | |
| | own to the employee/guests that are supposed to achieve them? | | | | | |
| PROCEDURES AND DOCUMEN | ives are discussed in management, staff, and user meetings. JTATION REVIEWED: | | | | | |
| NSLS FY 2008 ESH&Q Improven | | | | | | |
| NSLS OHSAS Management Syste COMMENTS: See Above. | m Manuai, LS-ESH-0041 | | | | | |
| FINDING: None | | | | | | |
| | | | | | | |
| Organization: NSLS | Date: 3/28/08 Au | ditor: L. | Stiegler/ | M. Bucl | cley | |
| Element: 4.4.4 | Title: Documentation | | | l | | |
| | Audit question | | Major | Minor | OFI | Meets |
| 1. Does the organization maintain OH&S management system documentation for the following? Record location of the document/record: | | | | | | |
| \[\bigsize \] \(\b | | | | | | ⊠ |
| documents (or does it fit with the Crosswalk between OHSAS 1800) | nents of the OH&S management system and their interactions, and reference to re he SBMS Subject Area) I Guidelines, Standards-Based Management System (SBMS) and NSLS Documen L/publications/manuals/ohsas/OCHSAS X-heck.pdf | | | | | |
| c. Documents & records required Hazard List NSLS Safety Asse http://www.nsls.bnl.gov/ESH/auth http://www.nsls.bnl.gov/ESH/auth http://www.nsls Job Risk Assessments (JRA) and http://www.nsls.bnl.gov/esh/ohsas Objectives NSLS ESH&Q Imp http://www.nsls.bn Management Reviews Copies http://www.nsls.bn.gov/ESH/200: http://www.nsls.bn.d.gov/ESH/200: http://www.nsls.bn.d.gov/ESH/200: http://www.nsls.bn.d.gov/ESH/200: http://www.nsls.bn.d.gov/ESH/200: Controlled Document Postings | by this OHSAS 18001 Standard, such as essment Document located on the NSLS website. Adocs/NSLS SAD/appendices.htm S.bnl.gov/ESH/authdocs/NSLS ASE.pdf Facility Risk Assessments (FRA) are located on the NSLS website. All All Default.htm http://www.nsls.bnl.gov/esh/ohsas/FRA/Default.htm Drovement Plans for current and previous fiscal year are located on the NSLS website. Ansls.bnl.gov/esh/safety/FY07 ESHO Improv Plan.pdf Inl.gov/esh/safety/FY08 ESHO Improvement Plan.pdf Of Presentation material and meeting minutes are located on the NSLS website. Tesh mgmt review.pdf Lgov/ESH/2007 minutes mgmt rev.pdf To ensure the effective planning, operation and control of processes that relate to the Operator Aids under the control of the NSLS Control Room Staff are located in the | site. | | | | ⊠ |
| room or are located at control pane Groups are located at the equipmer Record Storage location (or doe "NSLS EMS/OHSAS Records Ma few documents. Monitoring Records Personnel maintained in the Central Holding | els in the immediate area of the control room. Operator aids used by NSLS Technica it location. s it use Foremost only) NSLS OHSAS records are maintained as per NSLS proceding nagement" and are maintained in the NSLS Central Holding Area with the exception monitoring records are kept in Compliance Suite and other monitoring records are Area. | l ure | | | | |
| PROCEDURES AND DOCUMEN See links above | TATION REVIEWED: | | | | | |
| COMMENTS: See Above. | | | | | | |
| | | | | | | |

| Organization: NSLS | | Date: 03/24/08 | Audito | or: Keith | Klaus | | |
|---|--|--|---|-----------|-------|-----|-------|
| Element: 4.4.5 | Title: | Control of Documents | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| document? Observed State: Provisions for review, updati Procedure LS-QAP-0414 Do http://www.nsls.bnl.gov/new Approval of documents is co 6.1.4 Approve Document: Upon completion/concurrence of Remove the "DRAFT" marking The preparer and authorized in (LS-QAF-036). The graded approach should be prepared the document and responif further signatures are required. If document is Safety Significant, section. Guidance: If the controlled docum should sign-off on documents. If th level management should sign-off on Note: Signature approvals for support of forms may be included with the for | dividual(s) must provide their approval signature used when determining who should authorize a sible manager/supervisor must provide approva an NSLS ESH staff member must sign the appeart only applies to workers within a group, the goe controlled document applies to workers in must on documents. | e NSLS Quality Assurance Ma httm#6.1.4 pts below: priate individuals. re on a <u>NSLS Document Appro</u> documents. At a minimum, the pal signatures. Section heads ca proval form under the Safety Karoup supervisor and/or section altiple groups, section heads and the section heads are section heads and the section heads and the section heads are section heads and the section heads and the section heads are section heads are section heads and the section heads are sect | nual in: val Form verson that n determine Review n head nd/or higher | | | | |

| | 6.3.1 Responsible individuals or designees are responsible for periodically reviewing active controlled documents by the review frequency specified. Upon review of the document the responsible individual or designee does the | | |
|-----|---|--|--|
| | following: a. If after reviewing the document the result is that the document is accurate as is, up-to-date, reflects current requirements/policy, and changes are not needed, do the following: i. Policies, manuals, procedures, and requirements: | | |
| | Complete a <u>Periodic Review Form</u> and submit to the <u>Quality Control Coordinator (QCC)</u> ii. <u>EMS, and OHSAS Support Document:</u> For EMS/OHSAS Documents identified in Appendix B, submit an ATS closure statement for | | |
| | documents captured in the NSLS Assessment Tracking System (ATS). Forms and Operator Aids: Review should be included with the form's master procedure/document. Standalone Forms and Operator Aids not captured in the NSLS QA Database or NSLS ATS are to be reviewed as the form is used and revised when the changes to the associated process affect the form. | | |
| | Note: Some documents may be reviewed with the master document such as a manual or procedure and some documents will be reviewed as stand alone. Appendix B identifies those EMS/OHSAS Documents that will be reviewed with the master document. The Periodic Review Form will be maintained in the Central Filing System with the corresponding controlled document and can be signed off multiple times for future reviews. See the QCC if you wish to | | |
| | follow this method. b. If the result of the periodic review calls for changes, then revise the document as per <u>step 6.2</u> . Note: All review signatures reside on file with the master copy. | | |
| | In addition to these requirements the Quality Control Coordinator (QCC), tracks documents which are nearing periodic review dates as required in section 6.1.5b of the procedure. | | |
| | 6.1.5b Determine the required Document Review Frequency ¹ (time period) and enter this value in the designated location on the form. | | |
| | Controlled documents must be periodically reviewed to verify their accuracy. The cognizant engineer, scientist, or manager shall determine the frequency of review. The review frequency of controlled documents can be set to once every year or up to once every 5 years depending on the Environmental, Safety, Health, or Programmatic Impact. The greater the impact, the smaller the review period and vice versa. Emergency or safety procedures may need to be reviewed more frequently (e.g., 1 year). BNL or external drivers may already require a specific review period for a particular document. For example SBMS requires all energy control procedures to be reviewed at least annually. In addition to the procedure, the NSLS QCC will issue a reminder notice to responsible personnel 2-months prior to | | |
| | the periodic review due date for all documents entered into the NSLS QA database. An automatic reminder will be sent to responsible individuals for controlled documents entered into the NSLS Assessment Tracking System (ATS). | | |
| 2. | Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: | | |
| | Within NSLS Procedure LS-QAP-0414 Document Preparation and Control http://www.nsls.bnl.gov/newsroom/publications/manuals/qa/LS-QAP-0414.htm#6.1.4 Changes to procedures are documented and tracked using a revision log. The requirements for completing a revision log are located in section 6.1.5a of the procedure: | | |
| | 5a Include the following information in the Revision Log : Complete the Revision log by including: | | |
| | • subject /document title; | | |
| | • document number; | | |
| | • revision letter or number; | | |
| | description of key changes (Example wording for first revision include "Initial Release", First Release", or "Original Release") | | |
| | describe "Why" a step was added or changes were made if related to Occupational, Health, and Safety or significant environmental aspect. In addition reference source events, when applicable (e.g. Step added or changed due to safety incident or Nonconformance Report # LS-NC-2005-XXXX). | | |
| 3. | Does the organization ensure that relevant versions of applicable documents are available at points of use? Observed State: NSLS requires that paper copies of controlled documents be requested in section 3.4 of the procedure. | | |
| 3.4 | Controlled Document Use: Obsolete documents shall be removed from circulation and discarded or marked as "reference only" to prevent unintended use. Paper controlled documents should be marked accordingly (e.g. Controlled, Uncontrolled, Reference, Obsolete, etc.). When controlled paper copies are needed in the field, complete a Controlled Document Distribution List (QF-051) form and submit to the NSLS Quality Control Coordinator (QCC). Web based documents should contain the disclaimer indicated in section 6.1.2, as applicable. Users that print web-based documents must verify that it is the most current version by checking the document effective date on the NSLS website prior to use. | | |

| | Controlled document Distribution lists are completed by the person requesting a copy of a controlled document forms are checked monthly by the QCC to ensure that the versions in use are the current versions. | These | | | | |
|-----------|---|--------------|------------|-----------|------------|--------|
| 4. | How does the organization ensure that documents remain legible and readily identifiable? Observed State: All of the documents observed were legible (typed on a word processing program and printed on laser printers) | | | | | |
| | documents also were readily identifiable based on the use of a header, document title, revision date, and docum number. | ent | | | | |
| 5. | Are OH&S documents external origin identified and their distribution controlled? | | | | | |
| | Observed State: NSLS refers to SBMS Subject Areas, and Management Systems Records of Decision to identify documents of origin. NSLS also relies on the ESH&Q directorate to identify, distribute, and control documents necessary for planning and operation of the OH&S management system. | | | | | |
| 6. 3.4 | How does the organization prevent the unintended use of obsolete documents and apply suitable identification them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? Observed State: Within NSLS Procedure LS-QAP-0414 Document Preparation and Control http://www.nsls.bnl.gov/newsroom/publications/manuals/qa/LS-QAP-0414.htm#6.1.4 This requirement is explicitly addressed by the following requirement: Controlled Document Use: Obsolete documents shall be removed from circulation and discarded or marked "reference only" to prevent unintended use. Paper controlled documents should be marked accordingly (e. Controlled, Uncontrolled, Reference, Obsolete, etc.). When controlled paper copies are needed in the field complete a Controlled Document Distribution List (QF-051) form and submit to the NSLS Quality Control Coordinator (QCC). Web based documents should contain the disclaimer indicated in section 6.1.2, as applicable. Users that print web-based documents must verify that it is the most current version by checking the contain the disclaimer indicated in section by checking the contain the disclaimer indicated in section by checking the contain the disclaimer indicated in section by checking the contain the disclaimer indicated in section 6.1.2, as applicable. | ed as g. | | | | |
| | document effective date on the NSLS website prior to use. | | | | | |
| Proc | ROCEDURES AND DOCUMENTATION REVIEWED: ocedure LS-QAP-0414 Document Preparation and Control, Revision G, 9/14/2007 tp://www.nsls.bnl.gov/newsroom/publications/manuals/qa/LS-QAP-0414.htm#6.1.4 | | | | | • |
| COI | DMMENTS: | | | | | |
| | perating manuals for commercially available equipment are co-located with the equipment. Currently NSLS does n | ot inventor | ry these | documer | its. The S | SBMS |
| Sub | bject Area on Internal Controlled documents requires: "Documents of external origin (e.g., operating/maintenance manuals, contractor health and safety plans, contractor | actor proc | edures) | that are | necessar | v for |
| l | the planning and operation of a system/process that have an Environmental, Safety and Health (ESH) impact a | re required | l to be c | ontrolled | l." | |
| | n "Opportunity For Improvement" exists in identifying commercial manuals for safety significant processes and eq anuals, overhead cranes manuals, and High Sensitivity Smoke Detectors (HSSD). The manuals could be catalogue | | | | | cation |
| and | d revision of the manuals, the manuals could also be stamped "Controlled Document". | | | | | |
| FIN | NDING: MEETS REQUIREMENT | | | | | |
| | Organization: NSLS Date: 3/27/08 | Audit | or: M. B | ucklev | | |
| Eler | ement: 4.4.6 Title: Operational Control | - Tudio | 01. IVI. B | uckicy | | |
| | THE. Operational Control | | | | | |
| | Audit question | | Major | Minor | OFI | Meets |
| 1. | Does the organization have program[s] to implement: | | | | | |
| | □ a) operational controls, as applicable to the organization and its activities; the organization shall integral operational controls into its overall OH&S management system; | e those | | | | |
| | ☑ b.) controls related to purchased goods, equipment and services; | | | | | |
| | □ c.) controls related to contractors and other visitors to the workplace; | | | | | |
| | | he | | | | |
| | oxtimes e.) stipulated operating criteria where their absence could lead to deviations from the OSH policy and the | | | | | |
| | Observed State: | | | | | |
| 2. | How do organization OH&S programs include the management of change? | | | | | |
| | Observed State: The NSLS utilizes several processes to manage change in OH&S programs. This includes the Committees, e.g. Work Planning and Control, Interlock Working Group, ALARA, OHSAS, ESH, etc. The worplanning and control process captures changes in work, the experimental review process captures changes made experiments and experimental setup. The ESH&Q staff is routinely involved in operational meetings, system in | k e to | | | | |
| | and interacts with personnel in all aspects of the organization. | - + 10 VV 3, | | | | |
| 3. | A checklist is used to capture any changes to JRA's and FRA's in Design reviews and beamline reviews. Are relevant procedures and requirements communicated to the appropriate suppliers and contractors (are open | rational | | | | - |
| ٥. | Are relevant procedures and requirements communicated to the appropriate suppliers and contractors (are operative) controls in place and working as expected)? | тинопаі | | | | |
| | Observed State: BSA Terms and conditions are used to identify OSH requirements for suppliers and contractor is addressed in contracts and purchase orders for work performed onsite or for items procured. Depending on of work a Health and Safety Plan may be required. A Contractor Orientation Form and ESH Briefing for contractorm is used to determine training requirements and communicate ESH requirements for contractors. | he type | | | | |

| OHSAS 18001 INTERNAL AUDIT Attachment 5 | OF BNL ORGANIZATIONS FY2008 | Final Rev0 04/22/08 | | Page | e 50 of 7 | 73 | |
|--|---|--|---------------|-------------|-----------|----------|-------------|
| NSLS OHSAS Management Contractor Orientation Form NSLS Facility-Specific Envir EMS, FUA, and SAD/ASE O | Procedure, LS-ESH-PRM-1.3.6 System Manual, LS-ESH-0041 ronment, Safety, and Health (ESH) Brie | fing for Contractors | | | | | |
| COMMENTS: See Above. | | | | | | | |
| FINDING: None | | | | | | | |
| Organization: NSLS | | Date: 3/30/08 | Auditor: I | . Stiegler | /M. Bucl | kley | |
| Element: 4.5.3 | Title: Incident investig | gations, Nonconformity, Corrective a | nd Preventiv | ve Action | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization on SBMS)? | use their own procedure(s) for record, | investigate and analyze incidents? (_ | √rely | | | | ⊠ |
| of incidents; □ b.) identify the need for correc □ c.) identify opportunities for pr □ d.) identify opportunities for co □ e.) communicate the results of | reventative action; ontinual improvement; such investigations. | | occurrence | | | | |
| Observed State: 5 injuries winjury | rformed in a timely manner? (Determine reviewed, all paperwork and analys | es were complete within 2 weeks after | reporting of | | | | \boxtimes |
| 4. Were corrective action. Observed State: 4 out of 5 injuncted. | s or opportunities for preventative action juries had corrective/preventative action | on determined? as. The 5 th was a first aid case, no corre | ctive actions | | | | \boxtimes |
| Observed State: All were do Another one resulted in a Les | fincident investigation documented and ocumented on the SBMS OMC form. Obsons Learned. Forms are maintained by entered into the NSLS Family ATS Sys | one had an additional NSLS General Revente ESH Coordinator. Accidents and | | | | | \boxtimes |
| | conducted or revised as a result of incireviewed in 3 out of the 5 injuries. No | | | | | | |
| 7. Did the organization re preventative actions? Observed State: Changes in communicated to all employee | ecord any changes in their documented equipment were documented in 2 of the ees via the electronic newsletter dated O | I procedures resulting from corrective ereports. Safety update concerning inju | | | | | |
| 12/5/07, NSLS General Review Fo | VTATION REVIEWED: USLS-0001, OMC Line Organization Acomm 000544. SBMS Investigation of Incl. gov/newsroom/updates/2007/10-safet | cidents, Accidents and Injuries. | ated 6/7/07, | 7/2/07, 8/ | 27/07, 1 | 1/14/07, | |
| documented on the SBMS forms. | ries are thoroughly investigated and ana | lyzed on a graded approach. Correctiv | e actions we | re identifi | ed, impl | emented, | , and |
| FINDING: None | | | | | | | |
| Organization: NSLS | | Date: 03/26/08 | Aud | itor: Keith | Klaus | | |
| Element: 4.5.4 | | Title: Control of Records | 30 | | | | |
| | Audit question | | | Majo | Mino | OF | Mee |

| Organization: NSLS | | Date: 03/26/08 | Auditor: Keith Klaus | | | | |
|--|-----|---|----------------------|-------|-----|-------|--|
| Element: 4.5.4 | | Title: Control of Records | | | | | |
| Audit question | | | Major | Minor | OFI | Meets | |
| Does line organization implement its own procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records? Observed State: The NSLS has a procedure: LS-QAP-1003, NSLS EMS/OHSAS Records Management http://www.nsls.bnl.gov/newsroom/publications/manuals/qa/LS-QAP-1003.pdf The procedure references the BNL SBMS Subject Area on Records Management, and also provides guidance on identifying EMS/OHSAS records, submitting records to the NSLS QCC, filing records so that they are readily retrievable, maintaining records and records inventory, | | | | | | | |
| Observed State: NSLS has a procedure for ide | , . | s legibility, identification and traceabili the NSLS QA database as an additiona | - | | | | |

| of security. | | |
|---|--|-------------|
| Are the records stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss? (Evaluate at least three record locations/owners) Observed State: Records are stored in accordance with the procedure. | | |
| Requirements of the procedure include: 6.2 Determine the following: For EMS/OHSAS records that are not held in NSLS central holding area (Master File Room), maintain and inventory records as per Records Management subject area. Guidance may be obtained from the NSLS Records Representative. No further action is required from this procedure. For EMS/OHSAS records that are maintained in the NSLS central holding area and are listed on the records submission form or in Appendix A, continue to step 6.3. 6.3 Submit Record(s) to the QCC: | | |
| EMS/OHSAS records are submitted to NSLS Central Holding Area in two ways. | | |
| 1. For records that do not require the use of the records submission form, simply submit the record to the NSLS QCC and the record will be captured in the appropriate system - Refer to Appendix A for further guidance For records that do require the use of the records submission form, do the following: Submit the original or copy of the paper or electronic record to the QCC using the EMS/OHSAS Records Submission form: Select the Record generator; | | |
| Enter the Record date; Enter the Number of pages; Select a Series title - Refer to EMS/OHSAS Records Submission form for listing; Select a brief description of the record from the pull down menu (choose a description that best fits) and/or provide a further description in the "Other" field. Steps 6.4 through 6.7 apply to the QCC and QM. | | |
| 6.4 Filing Records Records submitted to the QCC that do not require the records submission form will be filed in their normal manner. EMS/OHSAS Records submitted via the records submission form to the QCC will be maintained as follows: | | |
| 6.4.1 Each hanging file folder will contain a Series title. | | |
| 6.4.2 Hanging file folders should be filed in alphabetical order according to the Series Titles listed on the EMS/OHSAS Records Submission Form. | | |
| 6.4.3 Interior folders/files will be filed in chronological order. | | |
| 6.5 Enter EMS/OHSAS record information and electronic files from 6.3 (step 2) into the NSLS EMS/OHSAS records database. Paper records need to be scanned and entered into the database. Follow the guidance document provided in the Records database. | | |
| 6.6 Records Maintenance: Review EMS/OHSAS Records Inventory annually; Submit new or updated records inventory form to the NSLS Records Representative as necessary; Destroy records as needed. | | |
| Location: Records Storage Area, OSH record 212, owner Andrew Ackerman, generator Mike Buckley. Quality Assurance and Conduct of Operations Assessment of 2006 NSLS Evacuation Drill, 02/14/07. The record was located in the Master file room in the proper location, was easily retrievable, protected against damage and loss (locked room, and locked file cabinet) and was digitally archived in the NSLS QA database. | | |
| Location: Engineering Master File room, 2-152, historical ODH calibration records on file, record inspected 09/29/05 O2 Monitor Quarterly Preventative maintenance Calibration Schedule for Me-049, X-5, room 1-169. The record was located in the file room in the proper location, was easily retrievable, protected against damage and loss (locked room, and locked file cabinet). Note, Current calibration records (2 years) are maintained in Design Room, 2-156, in binder maintained by QCC. Calibration records and tracking is conducted via Calibration Control database maintained by QCC. | | |
| Location: Control Room, owner Randy Church, Authorization for work on NSLS Safety System, #1269, was easily located in the control room in the NSLS Accelerator Safety System Binder. The records are protected against loss by virtue of being located in a continuously staffed secure location. | | |
| Location: Room 2-169, owner Al Boerner, Work permits on file in secure room protected against loss by virtue of being located in a continuously staffed secure location. Record reviewed was Work Permit # 290, 07/18/05. | | \boxtimes |

PROCEDURES AND DOCUMENTATION REVIEWED:

- LS-QAP-1003, NSLS EMS/OHSAS Records Management, http://www.nsls.bnl.gov/newsroom/publications/manuals/qa/LS-QAP-1003.pdf
- Appendix A EMS/OHSAS Records Guide http://www.nsls.bnl.gov/esh/qa/documents/NSLS EMS-OHSAS Records.pdf
 OSH record 212- Quality Assurance and Conduct of Operations Assessment of 2006 NSLS Evacuation Drill, 02/14/07.
- 3.
- 4. Historical ODH calibration record-09/29/05 O2 Monitor Quarterly Preventative maintenance Calibration Schedule for Me-049, X-5, room 1-169
- Authorization for work on NSLS Safety System, #1269 Work Permit # 290, 07/18/05

COMMENTS:

Opportunities For Improvement

- 1. LS-QAP-1003, NSLS EMS/OHSAS Records Management, Rev I, 02/05/08, http://www.nsls.bnl.gov/newsroom/publications/manuals/qa/LS-QAP-1003.pdf refers to section 6.7, the document ends at 6.6.
- 2. Consider scanning and digitally archiving all EMS/OHSAS records, for example ODH calibration records.
- 3. Update "Appendix A EMS/OHSAS Records Guide"
 - 90 day accumulation area checklists are archived in Master file room and in the NSLS QA database, the reference to room 1-178 should be deleted, and the owner changed from J. Aloi to K. Klaus. The "topic" field in the database indicates these records are "Environmental Program Support Documents"; this should be consistent with Appendix A.
 - ii) Radioactive Waste accumulation area checklists are archived in Master file room and in the NSLS QA database, the reference to room. These forms are omitted from the Appendix A records guide, they should be included in "Environmental Program Support Documents".
 - iii) The entry for Tier 1 Facility Safety Inspections should be updated on the Appendix A Records Guide. The record is the NSLS tier 1 database located on the NSLSNT1 server, the reference to room 1-177 should be deleted, and the responsible person should be changed from B. Chmiel to K. Klaus. The records system entry should be evaluated to determine if the BNL Records Management System is appropriate for a digital file.

FINDING: MEETS REQUIREMENT

Attachment 5 NSLS II

| Organization: NSLS-II | Date:31Mar2008 | Aud | itor: N. (| Gmür | | |
|--|---|---|---------------------|-----------|------------------------|-------------|
| Element: 4.3.1 | Title: Planning For Hazard Identification, Risk Assessmen | t and Risk C | ontrol | | | |
| | Audit question | | Major | Minor | OFI | Meets |
| SBMS OHSAS 18001 Prog Observed State: NSLS-II is limited amount of hands-on analysis and control. 1) The 5 are currently in use with retemplate in the SBMS Wor hazards, their controls and to The PSRFs are located in beas as the same of risk assessments has was produced for DOE Crital A Preliminary Safety Asses NSLS-II relies on the JRAs Directorate status. Copies of In addition to the above, ray Parameters and Beam Loss Strategy – 29Feb2008) risk | primarily in the design phase, thus most work is conducted in offices and design R&D work is taking place in Bldgs 902 and 905. NSLS-II utilizes two formats are first is to "build" a Project Safety Review Form (PSRF) around each R&D propore to come. The PSRF, written with worker participation, is based largely on a Planning & Control Subject Area and identifies the scope of work, the equipment training required. These forms are good for 1 year at which time they must be noted at each R&D site. In the project of the anticipated NSLS-II facility. The Preliminary Hazard and Decision-1 and the Final Hazard Analysis was produced for DOE Critical Decision-1 and the Final Hazard Analysis was produced for DOE Critical Decision-1 and the Final Hazard Analysis was produced for DOE Critical Decision-3. The that were originally established for NSLS and which are now gradually being me for relevant JRAs are added to PSRF binders. In the project of | n rooms. A for risk ject. Some the ESR ent used, the e renewed. Analysis ecision-2. oved to esign | | | | \boxtimes |
| non routine activities; all p Observed State: 1) PSRFs JRAs are reviewed and upd (PHA, FHA and PSAD to d | re updated 1 year after their inception. The first updates will occur in ~Aug. 20 tted, if needed, on a triennial basis. 3) A series of risk assessments of NSLS-II cate) are developed and documented as the design advances. | 08. 2) design | | | | \boxtimes |
| assessments? Were they u Observed State: 1) Change PSRF binder. A recent exa added to the PSRF itself at | the organization's facilities or operations that necessitated a change in the risk to-dated to cover the scope of the change? It o PSRFs during the course of a year, if minor, are added in memo addendum fample is a memo added to the Vibrating Wire PSRF. Any relevant information when time of the 1 year renewal. 2) JRAs are updated as changes are made in the of events occurring that may impact the contents of the JRAs. A recent example tryogens) JRA. | Form to the would be BNL | | | | \boxtimes |
| d.) signage/warning and/or within risks assessments an Observed State: All four el of the R&D projects. Document reviewed: The NSLS-II ESH Co was determined to be solutions of using suc it was determined that solution. Document reviewed: Document reviewed: | the the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering administrative controls; e.) personal protective equipment) when determining a dother planning documents? Extension of the hierarchy are considered in the development of the PSRFs and the substitution of the RF R&D project, a flux remover aerosol had been selected by the production of examined the contents and found that tetrachloroethylene was a composite carcinogen based on the list available in the BNL CMS web site. The engineer is an aerosol were examined (ventilation of work area, air sampling of breathing return of the aerosol to the vendor and substitution of a non-hazardous aerosol ventilation. | operation the workers. onent. This ring areas), and | | | | |
| Observed State: Controls a Procedures may also be dev controls are in place and to | place and working as specified? The stated in the PSRF and may include signs, barricades, PPE, training and otherseloped. The NSLS-II ESH Coordinator does periodic walk-arounds to assure the enhance communication with the workers to assure that upcoming issues are protected the development of a procedure and work sheet for air caster tests in the girder | at the perly | | | | \boxtimes |
| Observed State: The PSRI contractors or vendors, dep may come to the R&D site "Contractors Orientation For NSLS-II Training Coordina" | Inform contractors/interested parties of relevant operational controls applying is state, "This applies to the workers listed in this PSRF as well as any visitors, good inding on their level of involvement with the R&D project work." Contractors/vere under the supervision of their host and may fall under the requirements of them for NSLS and NSLS-II" if work is conducted and hazards may be encountered participates in contractor/vendor oversight. | uests, vendors who | | | | |
| PROCEDURES AND DOCUME Project Safety Review Forms (Vi Assessment Document, Bulk Shi NSLS-II Fire Protection Strategy | orating Wire, RF, Girder), Job Risk Assessments, Preliminary Hazard Analysis, elding Requirements for Final Design – 19Feb2008; Final Design Parameters and | Final Hazard d Beam Loss | Analysis Assumpt | , Prelimi | inary Saf I Jan2008 | Fety 3, |
| COMMENTS: Personnel contrib | nting to internal audit: W. Robert Casey, Nicholas Gmür, Lewis Doom, Hengjie | Ma, Chris W | eilandics | | | |
| FINDING: See above | | | | | | |

| Organization: NSLS-II | | Date: 31Mar2008 | Aud | itor: N. | Gmür | | |
|--|--|--|---|----------|-------|-------------|-------|
| Element: 4.3.3 | | Title: Objectives and program(s) | | | | | |
| | Audit question | on | | Major | Minor | OFI | Meets |
| Is there a documented freq Observed State: NSLS-II is ~2014. Prior to that will be in 2009; occupancy begins which includes OSH object Plan for the NSLS-II" that safety assessments and NEI | considerable design effort and limin 2010-2011; commissioning in 20 ves. This is given to new staff dure provides more detailed information | is a Project and will not go into full operation ited R&D work (current status). Construction 12. The Project currently has an "NSLS-II I ing their ESH orientation. The project also habout ISM as well as ESH program elements are for these two documents is 3 years. | n will start ESH Policy" as an "ESH | | | | |
| Are the Objectives measurable, where practicable? Are they consistent with the site level objectives, OH&S policy, including the commitments to the prevention of injury and ill health, to compliance and other requirements to which the organization subscribes, and to continual improvement? Observed State: The NSLS-II ESH Group Work Plan is geared to the analysis required for a project in the design phase. | | | | | | \boxtimes | |
| 3. Has the organization implemented a program[s] for achieving its objectives? Does it include a.) designation of responsibilities and authority for achieving objectives; and b.) means and time frame by which the objectives are to be achieved. Observed State: The ESH targets for the year are listed in the fiscal year work plan. These targets are tracked and reported monthly. | | | | | | | |
| Observed State: Through it | | rre supposed to achieve them? , R2A2s, Performance Appraisal goals. | | | | | |
| PROCEDURES AND DOCUME NSLS-II ESH Policy, NSLS-II E | | | | | | | |
| COMMENTS: Personnel contrib | | Casey, Nicholas Gmür, Chris Weilandics | | | | | |
| FINDING: See above | | | | | | | |
| Organization: NSLS-II | T | Date: 31Mar2008 | Aud | itor: N. | Gmür | | |
| Element: 4.4.4 | | Title: Documentation | | | • | • | |
| | Audit question | on | | Major | Minor | OFI | Meets |
| document/record: Currently file with the NSLS docume http://www.nsls.bnl.gov/ne | r, NSLS-II subscribes to the OHSA nt control group. A copy of the ma wsroom/publications/manuals/ohsa: | | copy is on | | | | |
| a. Description of the <u>scope</u> of scope) Fits within SBMS scope. | the OH&S management system fo | r its organization (or does it fit within the | e SBMS | | | | |
| | the SBMS Subject Area) Fits within | system and their interactions, and reference a SBMS Subject Area requirements. Details | | | | | |
| ☐ Hazard List In general, these project PSRFs. Construction haz and controls are described in the Assessment Document currently ☐ Risk Assessments Same as at ☐ Objectives General ESH obje See section 4.3.3 for more details ☐ Management Reviews On an as well as a DOE External Indepe | ards and controls are described in the Preliminary and the Final Hazard A ander development. ove. etives and targets are established by annual basis, the entire NSLS-II Presented to the state of the s | ally for NSLS-II, these are described in the very the ESH Construction Safety Plan. Operation analysis, and will be in the Preliminary Safety of the NSLS-II ESH Manager for the NSLS-II oject undergoes a DOE Critical Decision Lessegments that review the ESH status of the property of the | Project. | | | | |

| management of its OH&S ris. □Controlled Document Posthem. | k stings Documents posted by NSLS-II ES | operation and control of processes that real SH staff are dated and have the generator's the, records are maintained in the NSLS/NSI | name on | | | _ | |
|---|---|---|----------------|------------|--------|-----|-------------|
| EMS/OHSAS records manage | | QA Mgr. A records management program i | | | | | |
| development at NSLS-II. | itaring of NSI S-II Project work is condu | ucted by BNL Safety and Health Services s | taff | | | | |
| | | tered into the SHSD compliance suite datal | | | | | |
| PROCEDURES AND DOCU | MENTATION REVIEWED: | | | | | | |
| NSLS OHSAS manual, NSLS | S/NSLS-II EMS/OHSAS manual | | | | | | |
| COMMENTS: Personnel cont FINDING: See above | tributing to internal audit: W. Robert Ca | sey, Nicholas Gmür, Patrice Greenwood, C | Chris Weilandi | cs | | | |
| THYDRYG. See above | | | | | | | |
| Organization: NSLS-II | | Date: 31Mar2008 | Andi | itor: N. (| Gmür | | |
| Element: 4.4.5 | | • | Audi | 101. 11. (| Jiliui | | |
| Diement. Wite | ement: 4.4.5 Title: Control of Documents | | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| | Does the organization approve documents for adequacy prior to use and review, update as necessary and re-appro | | | | | | |
| document? Observed State: Yes. Note that the developing its own systems. | | | | | | | |
| | nsure that changes and the current revi ars, italics, or part of the document that | isions status of documents are identified? | (example: | | | | |
| Observed State: This as | pect of document control is currently bei | ing developed. Since most documents are | n early | | | | |
| stages of development, p | provisions for identifying revision status | are just now being implemented. | 29 | | | | |
| Observed State: PSRFs a | Does the organization ensure that relevant versions of applicable documents are available at points of use? Observed State: PSRFs are maintained in binders at each R&D site. Relevant ESH documents are currently being assembled as part of a SharePoint system in order to provide improved accessibility to NSLS-II workers. | | | | | | |
| | ion ensure that documents remain legib | | TEI . | | | | |
| | | scel and PowerPoint formats for legibility. rs, bulletin boards or file cabinets; they ma | | | | | |
| laminated in cases where pages that identify them. | | her environments. Documents have header | s or title | | | | |
| | of external origin identified and their di | istribution controlled? | | | | | |
| | Project Coordinators are to maintain instant of the R&D work. These manuals are | ruction manuals that accompany purchases | of new | | | | |
| | | lete documents and apply suitable identific | cation to | | | | |
| them if they are retained | d for any purpose (i.e. Stamped "obsole | te" or other suitable wording)? | | | | | |
| file cabinet for the storage | ge of obsolete documents. | ed this status. Current plans are to assign a | II NSLS-II | | | | |
| PROCEDURES AND DOCU | MENTATION REVIEWED: Project Sat | | | | • | • | |
| COMMENTS: Personnel cont FINDING: See above | tributing to internal audit: W. Robert Ca | sey, Nicholas Gmür, Patrice Greenwood, I | łengjie Ma, Cl | nris Weil | andics | | |
| THOMAS. See above | | | | | | | |
| Organization: NSLS-II | | Date: 31Mar2008 | Audi | itor: N. (| Gmiir | | |
| Element: 4.4.6 | | l . | Tud | 101. 11. 1 | Omui | | |
| Element. 4.4.0 | | Title: Operational Control | | | | | |
| | Audit question | ı | | Major | Minor | OFI | Meets |
| | | | | | - | | S |
| Project status, not an Op | perational status. The great bulk of the w | ortant to repeat here that NSLS-II is current rork is conducted in offices to support the de- e conventional facilities and of the accelera | esign phase | | | | |
| | | s time covered by Project Safety Review F eveloped Preliminary Hazard Analysis and | | | | | \boxtimes |
| Hazard Analysis docume | ents. These provide details for the project | cted hazards and controls for the conventio | nal facility | | | | |
| construction, and for the | accelerator and experimental programs. | Later this year, these documents will be u | | | | | |
| | Safety Assessment Document. ols, as applicable to the organization an | nd its activities; the organization shall inte | grate those | 1 | | | |
| operational controls into | o its overall OH&S management system | ı; | _ | | | | |
| (PSRF) | s are included in the requirements set out | t in the R&D work Project Safety Review I | OITIS | | | | |

| | □ b.) controls related to pur These controls are called out in procurement group assigned to the SBMS Acquisition Manag □ c.) controls related to con Again, these are called out in Contractor Orientation Form in □ d.) procedures to cover site objectives; Procedures, if needed, are add □ e.) stipulated operating or objectives. Observed State: These may be proved exist; therefore an Acceptage of the state | | | | | | |
|----------------|--|--|---|-------------|-------|------------|-------|
| 2. | not yet exist; therefore, an Accelerator Safety Envelope is not yet required. 2. How do organization OH&S programs include the management of change? Observed State: Change control at this time is managed as part of the design phase of the project. Changes to PSRFs are managed by the creating addenda and adding these to the PSRF binders. When the one year life cycle of a PSRF is over, addenda may be added to the body of the revised PSRF. NSLS-II specific change control processes are under development at NSLS-II. | | | | | | |
| 3. | operational controls in place Observed State: These require requirements in the Contracto developed for the conventional Statements of Work and Requ | and working as expected)? ements are set out in a number of ways r Orientation Form for NSLS and NSL al facility construction. BNL and NSL tests for Proposal for purchases. | Incoming contractors/vendors follow the S-II. A Construction Safety Plan is being S-II terms and conditions are applied to the | | | | |
| Con SBN | AS Acquisition Management Sy | SLS and NSLS-II, BNL People Soft we stem | eb-based Purchase Requisition system, Procurement | _ | | al and the | e |
| | MMENTS: Personnel contributi DING: See above | ing to internal audit: W. Robert Casey | , Nicholas Gmür, David Dale, Davis Paveglio, Chris | Weilandi | cs | | |
| 1.114 | DING. See above | | | | | | |
| Org | anization: NSLS-II | | Date:31Mar2008 Auc | litor: N. (| Gmür | | |
| Elei | ment: 4.5.3 | Title: Incident investis | gations, Nonconformity, Corrective and Preventiv | e Action | | | |
| | | Audit question | | Major | Minor | OFI | Meets |
| | | • | | jor | nor | Ŧ | ets |
| 1. | SBMS)? NSLS-II relies on guidance pr | heir own procedure(s) to record, investorovided in SBMS as well as additional | guidance provided in its own PRM 1.1.1, "Injury | jor 📗 | nor | | ets |
| 2. | SBMS)? NSLS-II relies on guidance prand Incident/Accident Investi Is it effective to: a.) determine underlying occurrence of incidents; Yes. b.) identify the need for co. c.) identify opportunities of the incidentify opportunities of the incidentification of the incidenti | their own procedure(s) to record, investigations and Critiques." To date, NSLS OH&S deficiencies and other factors, as stated in the investigation report. To preventative action; Yes, as stated in the for preventative action; Yes, as stated for continual improvement; Determining the further disseminated to the Light Step ded program. Its of such investigations. Yes, as emaintations and others. | guidance provided in its own PRM 1.1.1, "Injury S-II staff has not incurred any injuries or accidents. that might be causing or contributing to the investigation report. in the investigation report. ing lessons learned are part of the investigation cources Directorate (ESH Highlights) or further to ic injury report form concerning an NSLS user ils to staff, NSLS ESH Highlights, BNL Lessons | | | _ | |
| | SBMS)? NSLS-II relies on guidance prand Incident/Accident Investi Is it effective to: a.) determine underlying occurrence of incidents; Yes. b.) identify the need for co. c.) identify opportunities of the incidentify opportunities of the incidentification of the incidenti | their own procedure(s) to record, investigations and Critiques." To date, NSLS OH&S deficiencies and other factors, as stated in the investigation report. orrective actions; Yes, as stated in the for preventative action; Yes, as stated for continual improvement; Determine to be further disseminated to the Light Sed program. Girmed in the Nov. 11, 2005 cryogenicates of such investigations. Yes, as emaintations and others. | guidance provided in its own PRM 1.1.1, "Injury S-II staff has not incurred any injuries or accidents. that might be causing or contributing to the investigation report. in the investigation report. ing lessons learned are part of the investigation cources Directorate (ESH Highlights) or further to ic injury report form concerning an NSLS user ils to staff, NSLS ESH Highlights, BNL Lessons | | | _ | |
| 2. | SBMS)? NSLS-II relies on guidance prand Incident/Accident Investi Is it effective to: a.) determine underlying occurrence of incidents; Yes. b.) identify the need for co. c.) identify opportunities of the incidentify opportunities of the incidentification of the incidenti | neir own procedure(s) to record, investigations and Critiques." To date, NSLS OH&S deficiencies and other factors, as stated in the investigation report. or rective actions; Yes, as stated in the for preventative action; Yes, as stated for continual improvement; Determine to be further disseminated to the Light Sted program. If of such investigations. Yes, as emainations and others. If in a timely manner? (Determine the rection in the portunities for preventative action desportunities for preventative action desportunities for preventative action despond to the such investigation desportunities for preventative action despond to the control of the control | guidance provided in its own PRM 1.1.1, "Injury S-II staff has not incurred any injuries or accidents. that might be causing or contributing to the investigation report. in the investigation report. ing lessons learned are part of the investigation cources Directorate (ESH Highlights) or further to ic injury report form concerning an NSLS user ils to staff, NSLS ESH Highlights, BNL Lessons the timing of investigation[s]) | | | | |
| 3. 4. 5. | SBMS)? NSLS-II relies on guidance prand Incident/Accident Investi. Is it effective to: a.) determine underlying occurrence of incidents; Yes. b.) identify the need for co. c.) identify opportunities reporting process. These may the BNL/DOE Lessons Learn A through d above were confrom Columbia University. e.) communicate the result. Learned, User Meeting preser Were investigations performed Observed State: Yes, see above Were corrective actions or op Observed State: Yes, see above How were the results of incidents and Report" and sent to the SHSD the NSLS "General Review F | their own procedure(s) to record, investigations and Critiques." To date, NSLS OH&S deficiencies and other factors, as stated in the investigation report. Orrective actions; Yes, as stated in the for preventative action; Yes, as stated for continual improvement; Determine to be further disseminated to the Light Sted program. If the first of such investigations. Yes, as emainations and others. The investigation of the investigation of the investigation of the investigation of the investigation decent investigation documented and maded injuries are recorded on the BNL "Lip Safety Engineering Group for submissions". | guidance provided in its own PRM 1.1.1, "Injury 8-II staff has not incurred any injuries or accidents. that might be causing or contributing to the investigation report. in the investigation report. in the investigation report. in glessons learned are part of the investigation cources Directorate (ESH Highlights) or further to ic injury report form concerning an NSLS user ills to staff, NSLS ESH Highlights, BNL Lessons the timing of investigation[s]) termined? tintained? ne Organization Accident/Incident Investigation sion to CAIRS. Internal reviews are recorded on | | | | |
| 3. 4. 5. | SBMS)? NSLS-II relies on guidance prand Incident/Accident Investi. Is it effective to: a.) determine underlying occurrence of incidents; Yes. b.) identify the need for co. c.) identify opportunities j. reporting process. These may the BNL/DOE Lessons Learn A through d above were confrom Columbia University. e.) communicate the resulterned, User Meeting preser Were investigations performed Observed State: Yes, see above Were corrective actions or op Observed State: Yes, see above How were the results of incidents of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were risk assessments conductions of the NSLS "General Review F Were Review F W | their own procedure(s) to record, investigations and Critiques." To date, NSLS OH&S deficiencies and other factors, as stated in the investigation report. Orrective actions; Yes, as stated in the for preventative action; Yes, as stated for continual improvement; Determine to be further disseminated to the Light Steed program. If the firmed in the Nov. 11, 2005 cryogenists of such investigations. Yes, as emainations and others. If in a timely manner? (Determine the record of the investigation for the investigation for the investigation of the such investigation for the such inves | guidance provided in its own PRM 1.1.1, "Injury 8-II staff has not incurred any injuries or accidents. that might be causing or contributing to the investigation report. in the investigation report. ing lessons learned are part of the investigation fources Directorate (ESH Highlights) or further to ic injury report form concerning an NSLS user ills to staff, NSLS ESH Highlights, BNL Lessons the timing of investigation[s]) termined? tintained? tintained? | | | | |
| 3. 4. 5. | SBMS)? NSLS-II relies on guidance prand Incident/Accident Investiges is it effective to: a.) determine underlying occurrence of incidents; Yes. b.) identify the need for color. It is included in identify opportunities in it is included in identify opportunities in the BNL/DOE Lessons Learn A through d above were confrom Columbia University. e.) communicate the result Learned, User Meeting preser Were investigations performed Observed State: Yes, see above Were corrective actions or opposerved State: Yes, see above How were the results of incidents and Report" and sent to the SHSD the NSLS "General Review Form Were risk assessments conductions of the Conserved State: JRAs are exa Program Subject Area. The Joid the organization record of actions? | their own procedure(s) to record, investigations and Critiques." To date, NSLS OH&S deficiencies and other factors, as stated in the investigation report. orrective actions; Yes, as stated in the for preventative action; Yes, as stated for continual improvement; Determine to be further disseminated to the Light Sted program. If the firmed in the Nov. 11, 2005 cryogenials of such investigations. Yes, as emainations and others. If in a timely manner? (Determine the receive investigation in the such investigation for preventative action determines are recorded on the BNL "Lip Safety Engineering Group for submissions". It is a result of an event and enhanced as a result of an event and enhanced as a result of an event and enhanced as the result of an event. To tion. | guidance provided in its own PRM 1.1.1, "Injury S-II staff has not incurred any injuries or accidents. that might be causing or contributing to the investigation report. in the investigation report. ing lessons learned are part of the investigation fources Directorate (ESH Highlights) or further to ic injury report form concerning an NSLS user ils to staff, NSLS ESH Highlights, BNL Lessons the timing of investigation[s]) termined? tintained? | | | | |

FINDING: See above

Final Rev0 04/22/08

| COMMENTS: Personnel contributing to internal audit: W. Robert Casey, Nicholas Gmür, Chris Weilandics | | | | | | | | | |
|---|---|--|--------------|------------|-------------|-------------|-------------|--|--|
| FINDING: See above | | | | | | | | | |
| | | | | | | | | | |
| Organization: NSLS-II | | Date:31Mar2008 | Aud | itor: N. C | 3mür | | | | |
| Element: 4.5.4 | | Title: Control of Records | | | | | | | |
| Audit question | | | | | | OFI | Meets | | |
| Does line organization implement its own procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records? Observed State: A limited number of documents are managed through the NSLS QA manual "NSLS EMS/OHSAS Records Management" procedure. This program is still under development at NSLS-II. | | | | | \boxtimes | | | | |
| | OSH records legible, identifiable and to s, yes and under development for NSLS-II | | | | | \boxtimes | | | |
| deterioration or los | ored and maintained such that they are ss? (Evaluate at least three record locals is under development for NSLS-II. Har | | age, | | | \boxtimes | | | |
| Location: NSLS-II | Preliminary Hazard Analysis – Room 2-1 Final Hazard Analysis – Room 2-146/Bld | 46/Bldg 725C | | | | | \boxtimes | | |
| Location: NSLS-II | OHSAS communications – Room 2-146/ | Bldg 725C | | | | | \boxtimes | | |
| Location: NSLS-II Fire Protection Design Strategy – signed original with DOE/BHSO; pdf on NSLS-II intranet ESH SharePoint. | | | | | | | \boxtimes | | |
| PROCEDURES AND DO | PROCEDURES AND DOCUMENTATION REVIEWED: See above. | | | | | | | | |
| COMMENTS: Personnel | contributing to internal audit: W. Rober | t Casey, Nicholas Gmür, Patrice Greenwood, Cha | rlotte Niels | son, Chri | s Weilar | ndics | | | |

Attachment 5 Physics Department

| Organization: Physics Department (PO) Date: 4/1/08 | | | Date: 4/1/08 | Au | ditor: R. | Gill | | |
|---|---|--|---|--------------|-----------|-------|-----|-------------|
| Elen | nent: 4.3.1 | Title: Planning For Hazard I | dentification, Risk Assessmen | t and Risk C | ontrol | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| 1. | SBMS OHSAS 18001 Progre Observed State: Physics inclu | ides risk assessment as part of experiment safety | y reviews. | | | | | \boxtimes |
| 2. | Are the line organizations Ri non routine activities; all per Observed State: All risk asses part of each Experiment Safet | isk Assessments up-to-date? Do they cover cur- rsonnel and all facilities? ssments are current and have been updated as no ty Review. | rent full scope of operations; reeded. Risk assessments are inc | luded as | | | | \boxtimes |
| 3. | | e organization's facilities or operations that no to-dated to cover the scope of the change? | ecessitated a change in the risi | k | | | | \boxtimes |
| Did the organization observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Observed State: | | | | | | | | |
| 5. Are operational controls in place and working as specified? | | | | | | | | |
| Observed State: Yes, verified through Tier 1 inspections that specifically target controls. 6. What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? Observed State: In general, Physics does not interact with contractors, other than vendors who may service devices, such as photocopy machines. Work Permits are used to review these tasks. | | | | | | | | |
| | CEDURES AND DOCUMEN MENTS: | ITATION REVIEWED: | | | | | | |
| | DING: | | | | | | | |
| | | | | | | | | |
| _ | nization: Physics Department | (PO) | Date: 4/1/08 | Aud | ditor: R. | Gill | | |
| Elen | nent: 4.3.3 | Title: (| Objectives and program(s) | | | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| 1. | Is there a documented freque | tives established and at what frequency? ency to review status of objectives? (other than re established annually. Outlook tasks are used a | | racking of | | | | |
| 2. | including the commitments to the organization subscribes, Observed State: Objectives an improvement of the Physics I | | npliance and other requirement to the operations, needs, and | nts to which | | | | \boxtimes |
| 3. | responsibilities and authority be achieved. Observed State: Annual targe when they are documented. T | nented a program[s] for achieving its objectives of for achieving objectives; and b.) means and to ts, expected completion dates, and implementation when the web site has the current document. | time frame by which the objection details are assigned to indiv | tives are to | | | | \boxtimes |
| 4. | , | | | | | | | \boxtimes |
| | CEDURES AND DOCUMEN | TATION REVIEWED: | | | | | | |
| | MMENTS: DING: | | | | | | | |
| 1 11 1 | 2111U. | | | | | | | |

OHSAS 18001 INTERNAL AUDIT OF BNL ORGANIZATIONS FY2008 Final Rev0 04/22/08 Page 59 of 73 Attachment 5 Organization: Physics Department (PO) Date: 4/1/08 Auditor: R. Gill Element: **4.4.4** Title: Documentation Major Meets Minor OFI Audit question Does the organization maintain OH&S management system documentation for the following? Record location of the \boxtimes document/record: ESSH Office (1-43) has signed originals. Documents are available on-line to use as needed. П П П \boxtimes scope) ☑ b. Description of the main elements of the OH&S management system and their interactions, and reference to related \boxtimes documents (or does it fit with the SBMS Subject Area) c. Documents & records required by this OHSAS 18001 Standard, such as ⊠Hazard List **⊠**Risk Assessments \boxtimes **⊠**Objectives Management Reviews

☐ Management Reviews d. Documents & records necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risk **⊠**Controlled Document Postings \boxtimes Record Storage location (or does it use Foremost only) Monitoring Records (N/A) PROCEDURES AND DOCUMENTATION REVIEWED: COMMENTS: The Physics Department has not identified any required monitoring. FINDING: Organization: Physics Department (PO) Date: 4/1/08 Auditor: R. Gill Element: **4.4.5** Title: Control of Documents Minor OFI Audit question Does the organization approve documents for adequacy prior to use and review, update as necessary and re-approve document? \boxtimes Observed State: Signed copies are maintained in safety office records. An Outlook task is used to remind responsible persons when updates are due. Does the organization ensure that changes and the current revisions status of documents are identified? (example: \boxtimes track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: Change log is part of document, and old versions are kept in an "obsolete" folder. Does the organization ensure that relevant versions of applicable documents are available at points of use? \boxtimes Observed State: System manager ensures that the current version is on the web page. Web documents include warning П П П to check for current version. In reality, the controlled documents are not useful How does the organization ensure that documents remain legible and readily identifiable? \boxtimes Observed State: Primary source is the web page. Each document has a title and identification number. Are OH&S documents external origin identified and their distribution controlled? \boxtimes Observed State: Presently, there are none. How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? \boxtimes Observed State: Only current documents are on the web page. Obsolete paper (signed) versions are kept in a separate PROCEDURES AND DOCUMENTATION REVIEWED: COMMENTS: FINDING: Auditor: R. Gill Organization: Physics Department (PO) Date: 4/1/08 Element: **4.4.6** Title: Operational Control Minor OFI Audit question Does the organization have program[s] to implement: \boxtimes a) operational controls, as applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system; ☑ b.) controls related to purchased goods, equipment and services;

 \boxtimes c.) controls related to contractors and other visitors to the workplace;

objectives;

 \square d.) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the

| OHSAS 18001 INTERNAL AUD Attachment 5 | HSAS 18001 INTERNAL AUDIT OF BNL ORGANIZATIONS FY2008 Final Rev0 04/22/08 ttachment 5 | | | Page | e 60 of 7 | 73 | |
|--|---|---|---------------|-----------|-----------|-----|-------------|
| objectives. | | of purchases as required. c) Work permits | | | | | |
| for contractors, and visitor | s are included in ESRs. d) N/A. e) N/A | L. | are issued | | | | |
| Observed State: ESH Coor teams, and attend SBMS to | raining sessions. Changes to systems ar | et of change? ervices, participate in SBMS Subject Area on and or documents are discussed with senior committee (Group Safety Coordinators). | levelopment | | | | |
| 3. Are relevant procedures a | | e appropriate suppliers and contractors (a | re | | | | |
| PROCEDURES AND DOCUM | ENTATION REVIEWED: | | | | | | |
| COMMENTS: FINDING: | | | | | | | |
| | | | | | | | |
| Organization: Physics | s Department (PO) | Date 4/1/08 | Au | ditor: R. | Gill | | |
| Element: 4.5.3 | Title: Incident inve | estigations, Nonconformity, Corrective a | nd Preventive | Action | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization on SBMS)? | on use their own procedure(s) for reco | ord, investigate and analyze incidents? (_2 | Xrely | | | | \boxtimes |
| of incidents; | rective actions; r preventative action; r continual improvement; | at might be causing or contributing to the | occurrence | | | | |
| Observed State: N/A | rmea in a timety manner? (Determine | e the timing of investigation[s]) | | | | | |
| 4. Were corrective actions of Observed State: N/A | r opportunities for preventative action | determined? | | | | | \boxtimes |
| | acident investigation documented and | maintained? | | | | | \boxtimes |
| | nducted or revised as a result of incide | ents/events? | | | | | \boxtimes |
| actions? Observed State: N/A | | procedures resulting from corrective and p | reventative | | | | |
| PROCEDURES AND DOCUM COMMENTS: | ENTATION REVIEWED: | | | | | | |
| FINDING: | | | | | | | |
| | | | 1 | | | | |
| Organization: Physics | Department (PO) | Date: 4/1/08 | Au | ditor: R. | Gill | | |
| Element: 4.5.4 | | Title: Control of Records | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| Does line organization im and disposal of records? Observed State: No. | plement its own procedure(s) for the i | identification, storage, protection, retrieva | l, retention | | | | |
| | records legible, identifiable and trace | eable? | | | | | |
| 3. Are the records stored an deterioration or loss? (E | valuate at least three record location | dily retrievable and protected against da is/owners) ers, and were easily retrieved for inspection | | | | | |
| Sossived State. Records a | 10 In tabeled folder | , and more easily redicted for hispection | · | | | l | + |

Location: Building 510, room 1-135, 90-Day Area inspection checklist.

Location: Building 510, room 2-212, Experiment Safety Review records.

Location: Building 510, room 1-41, ESSH and Group Safety Coordinator meeting minutes. Location: PROCEDURES AND DOCUMENTATION REVIEWED: COMMENTS: FINDING:

Attachment 5 Instrumentation Division

| Organization: Instrumentation | | Date: 03/27/08 | Audite | or: M. Ra | ankine | | |
|--|--|--|--------------|-----------|--------|-----|-------------|
| Element: 4.3.1 | Title: Planning For Hazard I | dentification, Risk Assessmen | t and Risk C | ontrol | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| 1. Does the organization use a n SBMS OHSAS 18001 Progra Observed State: | nethodology of documenting risk assessment of mean ? _X_ No Yes. | and control other than that des | scribed in | | | | \boxtimes |
| non routine activities; all per | sk Assessments up-to-date? Do they cover cur sonnel and all facilities? ones are being added, bus travel and radioactive | | outine and | | | | |
| 3. Have changes occurred in the | e organization's facilities or operations that no o-dated to cover the scope of the change? | ecessitated a change in the risi | k | | | | \boxtimes |
| 4. Did the organization observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Observed State: Document reviewed: ASR # 7: Semiconductor Detector Processing Document reviewed: ASR #11: Machine Shop Document reviewed: ASR # 13: 90-Day Accumulation Area | | | | | | | × |
| 5. Are operational controls in place and working as specified? Observed State: Controls are in place and working as specified. | | | | | | | \boxtimes |
| 6. What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? Observed State: Work orders provided by Building Manager. Work permits, and guest training are provided to contractors/interested parties. | | | | | | | \boxtimes |
| PROCEDURES AND DOCUMENTATION REVIEWED: Work Permit | | | | | | | |
| COMMENTS: | eviewed each year instead of all being reviewed | Lavary 2 years | | | | | |
| FINDING: NONE | eviewed each year mistead of an being reviewed | i every 3 years. | | | | | |
| | | | | | | | |
| Organization: Instrumentation | | Date: 03/27/08 | Audito | or: M. Ra | ankine | | |
| Element: 4.3.3 | Title: (| Objectives and program(s) | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| Is there a documented freque | ives established and at what frequency? Yes, mcy to review status of objectives? (other than is formally reviewed semi-annually and is con | SBMS) | | | | | \boxtimes |
| 2. Are the Objectives measurable including the commitments to the organization subscribes, a Observed State: Yes | le, where practicable? Are they consistent wit. o the prevention of injury and ill health, to count to continual improvement? | h the site level objectives, OH. npliance and other requireme | nts to which | | | | \boxtimes |
| | ented a program[s] for achieving its objectives for achieving objectives; and b.) means and t | | | | | | \boxtimes |
| | wn to the employee/guests that are supposed t OSH Management Program and Plan was sent | | ted on the | | | | \boxtimes |
| PROCEDURES AND DOCUMENT FY2008 OSH Management Program | | | | | | | |
| COMMENTS: | | | | | | | |
| FINDING: NONE | | | | | | | |
| Organization: Instrumentation | | Date: 3/27/08 | Audita | or: M. Ra | ankine | | |
| Organization: Instrumentation Date: 3/27/08 Auditor: Element: 4.4.4 Title: Documentation | | | | | | | |

| | Audit question | | | Major | Minor | OFI | Meets |
|---|---|--------------------------------------|------------------|-----------|-----------|-------------|-------------|
| 1. Does the organization mainto document/record: Yes | ain OH&S management system documer | ntation for the following? Record | ocation of the | | | | |
| a. Description of the scope of the scope) Yes | e OH&S management system for its orgo | anization (or does it fit within th | ne SBMS | | | | \boxtimes |
| | nents of the OH&S management system on the SBMS Subject Area) Yes | and their interactions, and referen | ce to related | | | | \boxtimes |
| c. Documents & records required by Hazard List (Yes, ASRs and RAs Risk Assessments (JRS, FRA, All Depictives (FY OSH Plan) Management Reviews (FY07 is a | RA) | | | | | | ⊠ |
| management of its OH&S risk Controlled Document Postings Record Storage location (or document Monitoring Records | ☐ Controlled Document Postings ☐ Record Storage location (or does it use Foremost only) | | | | | | |
| | itoring results are not always sent out to e | very employee who is at risk to ma | ke sure precauti | ons are t | aken as a | a result o | of the |
| | | | | | | | |
| Organization: Instrumentation Date: 3/27/08 Audit Element: 4.4.5 Title: Control of Documents | | | | | | | |
| Element: 4.4.5 | | | | | | | |
| Audit question | | | | | Minor | OFI | Meets |
| Does the organization approve documents for adequacy prior to use and review, update as necessary and re-approve document?. Yes Observed State: OSH type documents receive signature approval before being posted and revision logs are kept. | | | | | | | \boxtimes |
| Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) Yes Observed State: OSH type documents receive signature approval before being posted and revision logs are kept. | | | | | | | |
| | e that relevant versions of applicable doc version of OSH type documents is availab | | se? Yes | | | | \boxtimes |
| | nsure that documents remain legible and to date revisions are kept on the web. Eac | | ctive date on | | | | |
| Are OH&S documents extern Observed State: | nal origin identified and their distribution | n controlled? | | | | | N/A |
| them if they are retained for a | revent the unintended use of obsolete do any purpose (ie. Stamped "obsolete" or a ocuments are stamped "legacy" or "obsol | other suitable wording)? | ication to | | | \boxtimes | |
| PROCEDURES AND DOCUMEN | | | | | • | | |
| COMMENTS: FINDING: NONE | | | | | | | |
| | | I | | | | | |
| Organization: Instr | rumentation | Date: 3/27/08 | Audit | or: M. R | ankine | | |
| Element: 4.4.6 | | Title: Operational Control | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| ☒ a) operational controls, as operational controls into its o ☒ b.) controls related to pure ☒ c.) controls related to control | Does the organization have program[s] to implement: □ a) operational controls, as applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system; □ b.) controls related to purchased goods, equipment and services; □ c.) controls related to contractors and other visitors to the workplace; | | | | | | |
| objectives; | tuations where the absence could lead to | | | | | | |

FINDING: NONE

| 7 Mas 1 m 1 c m | | | | | | | |
|---|--|--|----------------|-----------|--------|-----|-------------|
| | programs include the management of essed in section 3.0 Program Operation | fchange? of the ASR Program. The SME evaluat | es each | | | | |
| operational controls in place | | propriate suppliers and contractors (and contractor) (and contractor) vendor training. | re | | | | |
| PROCEDURES AND DOCUMEN Screening Guidelines for Work Per Checklist for Work Permit and Pure | mit Determination | | | | l | | |
| COMMENTS: There is no docume | entation provided to prove that vendor h | as taken unique training that is not track | ked on the we | b. | | | |
| FINDING: NONE | | | | | | | |
| Organization: Instrumentation | | Date: 3/27/08 | Audit | or: M. R | ankine | | |
| Element: 4.5.3 | Element: 4.5.3 Title: Incident investigations, Nonconformity, Corrective and Preventive Action | | | | | | |
| Audit question Audit question | | | | | | | Meets |
| | use their own procedure(s) for record, | investigate and analyze incidents? (_ | _Xrely | | | | \boxtimes |
| on SBMS)? 2. Is it effective to: □ a.) determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents; □ b.) identify the need for corrective actions; □ c.) identify opportunities for preventative action; □ d.) identify opportunities for continual improvement; □ e.) communicate the results of such investigations. | | | | | | | |
| 3. Were investigations performed in a timely manner? (Determine the timing of investigation[s]) Observed State: N/A | | | | | | | |
| 4. Were corrective actions or opportunities for preventative action determined? Observed State: N/A | | | | | | | |
| | lent investigation documented and ma | intained? | | | | | |
| | icted or revised as a result of incidents. | /events? | | | | | |
| | | edures resulting from corrective and p | reventative | | | | |
| | | evention of FY08 OSH Plan is successfu | ally completed | 1. | | | |
| FINDING: NONE | | | | | | | |
| Organization: Instrumentation | | Date:3/27/08 | Audit | or: M. Ra | ankine | | |
| Element: 4.5.4 | | Title: Control of Records | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets |
| and disposal of records? | ment its own procedure(s) for the identity were well maintained, legible, and identity | ttification, storage, protection, retrieva ntifiable | l, retention | | | | \boxtimes |
| | cords legible, identifiable and traceab | | | | | | |
| 3. Are the records stored and a deterioration or loss? (Eval | maintained such that they are readily luate at least three record locations/o | y retrievable and protected against da wners) | ımage, | | | | |
| Observed State: Yes Location: Division's Record of Location: Online Site http:// | intranet.bnl.gov/inst/ims> | | | | | | |
| Location: Archival Data Stora Location: PROCEDURES AND DOCUMEN | | | | | | | \boxtimes |
| COMMENTS: | TATION REVIEWED. | | | | | | |

Attachment 5 Support Organizations Reporting to the Director's Office

| Orga | nnization: SORD- Quality Man | agement Office (QMO) | Date: 3/17/08 | Aud | litor: S. S | | | |
|---|---|---|---------------------------------------|---------------|-----------------|-------|-----|-------------|
| Elen | nent: 4.3.1 | Title: Planning For Haza | ard Identification, Risk Assessmen | nt and Risk C | ontrol | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| 1. | SBMS OHSAS 18001 Progra | methodology of documenting risk assessmam? No Yes allows the Subject Area: OHSAS 18001 Pr | | | | | | |
| 2. Are the line organizations Risk Assessments up-to-date? Do they cover current full scope of operations; routine and non routine activities; all personnel and all facilities? Observed State: The QMO Facility, Area, and Job Risk Assessments are current (done in May 2007) and covers the full scope of operations; routine and non routine activities; all personnel and all facilities. | | | | | | | | \boxtimes |
| 3. | 3. Have changes occurred in the organization's facilities or operations that necessitated a change in the risk assessments? Were they up-to-dated to cover the scope of the change? Observed State: There were no changes in facilities or operations since the Facility, Area, and Job Risk Assessments | | | | | | | |
| 4. | were completed. | | | | | | | ⊠ |
| 5. | | place and working as specified? nat new appliance are in place and that ergo | onomic reviews were done. | | | | | \boxtimes |
| 6. What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? Observed State: QMO uses the BNL requisition system to flow any requirements pertaining to operational controls to contractures/interested parties. | | | | | | | | \boxtimes |
| | | TATION REVIEWED: See above. largely office work (e.g., computer related | activities) | | | | | |
| FINI | DING: None | largery office work (e.g., comparer related | detrities). | | | | | |
| Orga | nnization: SORD- Quality Man | agement Office (QMO) | Date:3/13/08 | Aud | litor: S. Stein | | | |
| Elen | nent: 4.5.4 | | Title: Control of Records | | | | | |
| | | Audit question | | | Major | Minor | OFI | Meets |
| 1. | and disposal of records? Observed State: QMO follow Directorate Records Manager | | ectorate procedure, <u>DH-ADM-002</u> | | | | | |
| 2. | Observed State: Records are stored in file folders with descriptive tabs. The records listed below were legible and | | | | | | | |
| 3 | retrievable. The file folders do not have the file code listed. (OFI). 3. Are the records stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss? (Evaluate at least three record locations/owners) Observed State: All records are stored in file cabinet and separate file folders in Bldg. 902C. It was observed that FY07 JRA/FRA and Objective/Targets records were not cutoff after the year. | | | | | | | |
| J. | Are the records stored and deterioration or loss? (Eval Observed State: All records a JRA/FRA and Objective/Targ | maintained such that they are readily re tuate at least three record locations/own re stored in file cabinet and separate file for gets records were not cutoff after the year. | ers) | | | | | |
| | Are the records stored and deterioration or loss? (Eval Observed State: All records a JRA/FRA and Objective/Targ Location: FY08 JRA/FRA – Location: FY08 Objective/Ta Location: R2A2s – R. Lebel's Location: | maintained such that they are readily re luate at least three record locations/own re stored in file cabinet and separate file for gets records were not cutoff after the year. hall file cabinet regets – hall file cabinet s office, file cabinet | ers) | | | | | |
| PRO | Are the records stored and deterioration or loss? (Eval Observed State: All records a JRA/FRA and Objective/Targ Location: FY08 JRA/FRA – Location: FY08 Objective/Ta Location: R2A2s – R. Lebel's Location: | maintained such that they are readily re tuate at least three record locations/own re stored in file cabinet and separate file for gets records were not cutoff after the year. hall file cabinet rgets – hall file cabinet | ers) | | | | | \boxtimes |

| Organization: SORD- CEG | PA | | Date: 3/24/08 | Auditor: N | I. Bernho | lc/F. Ho | rn | | | |
|--|--|---|---|---------------|---------------------|------------|----------|-------------|--|--|
| Element: 4.3.1 | | Title: Planning For Hazard I | dentification, Risk Assessme | nt and Risk C | ontrol | ontrol | | | | |
| Audit question | | | | | | Minor | OFI | Meets | | |
| Does the organization use a methodology of documenting risk assessment and control other than that described in SBMS OHSAS 18001 Program? _x_ No Yes Observed State: NA Are the line organizations Risk Assessments up-to-date? Do they cover current full scope of operations: routine and | | | | | | | | ⊠ | | |
| 2. Are the line organizations Risk Assessments up-to-date? Do they cover current full scope of operations; routine and non routine activities; all personnel and all facilities? Observed State: All risk assessments reviewed are up to date. The organization has started the review process of the JRAs. At this time 4 JRAs have been reviewed and about 1/3 are anticipated to be completed this year. | | | | | | | | | | |
| | OFI. On the Photo Archiving JRA. Keep track of expected improvements separately until it is actually put in place. OFI. Production services indicated at the top of the JRA what changes were made in the document. Additionally place a bar | | | | | | | | | |
| 3. Have changes occurr assessments? Were to Observed State: No ch | ed in th hey up-t nanges h | e organization's facilities or operations that n to-dated to cover the scope of the change? have occurred that necessitated a change in the | risk assessment. | | | | | \boxtimes | | |
| d.) signage/warning a within risks assessme Observed State: Document review | nd/or ad nts and wed: En | the hierarchy of controls (i.e.: a.) elimination dministrative controls; e.) personal protective e other planning documents? nail from F. Horn to R. Backofen regarding rep new choice was equivalent to the old item. | equipment) when determining | controls | | | | \boxtimes | | |
| Observed State: Work | ers wer | lace and working as specified? e observed using hearing protection and safety | | | | | | | | |
| Observed State: Users come in routinely go t | | | | | | | | \boxtimes | | |
| 3. R. Backofen provided 4. Contractor Vendor Tractor Vendor Tractor Vendor Tractor Vendor Tractor Vendor Tractor Vendor V | for Prod ng, Driv d Audito aining v ng JRA. | | with the JRA's annually. The self of the | ace. | on the sid | e of the 1 | row when | re a | | |
| change is made. FINDING: | | | | | | | | | | |
| | | | | 1 | | | | | | |
| Organization: SORD- CEG Element: 4.3.3 | PA | Ti'd 4 | Date: 3/24/08 | Auditor: N | N. Bernholc/F. Horn | | | | | |
| Element. 11010 | | Title: (| Objectives and program(s) | | | | | | | |
| | | Audit question | | | Major | Minor | OFI | Meets | | |
| Is there a documented | d freque | tives established and at what frequency? ency to review status of objectives? (other than be established annually. The current objectives | | | | | | | | |
| including the commit the organization subs Observed State: The o | <i>ments to</i> cribes, objective | le, where practicable? Are they consistent with the prevention of injury and ill health, to contain the continual improvement? The incorporate the laboratory commitment to Imparts and meet or exceed DOE goals. | mpliance and other requireme | ents to which | | | | | | |
| responsibilities and a be achieved. | uthority | ented a program[s] for achieving its objective of for achieving objectives; and b.) means and tible persons are indicated for achieving the objective | time frame by which the obje | ctives are to | | | | \boxtimes | | |
| 4. How are objectives m Observed State: Goals | ade kno and ob | own to the employee/guests that are supposed in jectives are located on CEGPA OSH website a | Observed State: Goals and objectives are located on CEGPA OSH website and in CEGPA business plan. Everyone has | | | | | | | |
| Observed State: Goals and objectives are located on CEGPA OSH website and in CEGPA business plan. Everyone has access and the owners report at CEGPA manager's meetings. PROCEDURES AND DOCUMENTATION REVIEWED: | | | | | | | | | | |
| CEGPA 08 Objectives | CUMEN | TATION REVIEWED: | | | | | | | | |
| | CUMEN | TATION REVIEWED: | | | | | | | | |

Final Rev0 04/22/08

FINDING: CEGPA meets the requirement in this area. Organization: SORD- CEGPA Date: 3/24/08 Auditor: N. Bernholc/F. Horn Element: **4.4.5** Title: Control of Documents Minor OFI Audit question Does the organization approve documents for adequacy prior to use and review, update as necessary and re-approve document?. \boxtimes Observed State: Document review process was observed for 3 Office of education procedures and the JRA process. Does the organization ensure that changes and the current revisions status of documents are identified? (example: \boxtimes track changes, margin bars, italics, or part of the document that reviews changes.) Observed State: On the last page of the documents the revision number is indicated Does the organization ensure that relevant versions of applicable documents are available at points of use? Observed State: A copy of the document was located at the field location. The central posting board was viewed in building 438. The M. Morris is responsible for the board and indicated that he attends building manager meetings that discuss what needs to be posted and is a recipient of the postings. If he misses a П \boxtimes meeting he can refer to the building manager website which indicated what needs to be posted. http://bldgmanagers.bnl.gov/ http://bldgmanagers.bnl.gov/faqs/BNL%20Official%20Postingsrev030107.pdf S. Bronson indicated that the updated procedures are kept at the site. How does the organization ensure that documents remain legible and readily identifiable? Observed State: Originals are kept filed in central locations as indicated in the document \boxtimes OFI. The filing location list is in process of being updated. Are OH&S documents external origin identified and their distribution controlled? How does the organization prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose (ie. Stamped "obsolete" or other suitable wording)? \boxtimes Observed State: Obsolete documents were shown with the word obsolete written on it. The users are in middle of updating document and are researching other methods of doing this. PROCEDURES AND DOCUMENTATION REVIEWED: CEGPA JRAs. Office of Education Learning Procedures - continued on next page. Static Electricity Advanced Static Electricity RHIC Lesson Office of Education/Medical Work Permit. Persons Interviewed: R. Backofen, S. Bronson, K. Gurski, M. Morris; K. White COMMENTS: OFI. The Office of Education procedures are given a new revision number even if no changes are made (except for the signature). It is suggested to have a paragraph at the end of the document the shows the change history (e.g. if there is no change and reason for the change. It can also be kept as a separate document indicating the details of this information. OFI: Some forms that are used to register incoming students do not have dates on them. Though this is not a safety and health issue it is suggesting that they also have dates and or revision numbers. FINDING: OFI. The Health & Safety Record/Document Management Requirement - Line Organization Files for CEGPA/PA is in process of being updated due to location changes for buildings. Vv OFI. The Office of Education procedures are given a new revision number even if no changes are made (except for the signature). It is suggested to have a paragraph at the end of the document the shows the change history (e.g. if there is no change and reason for the change. It can also be kept as a separate document indicating the details of this information. OFI: Some forms that are used to register incoming students do not have dates on them. Though this is not a safety and health issue it is suggesting that they also have dates and or revision numbers. Organization: SORD- CEGPA Auditor: N. Bernholc/F. Horn Date: 3/24/08 Element: **4.4.6** Title: Operational Control Major Meets Minor H H Audit question \boxtimes Does the organization have program[s] to implement: ☑ a) operational controls, as applicable to the organization and its activities; the organization shall integrate those operational controls into its overall OH&S management system; ☑ b.) controls related to purchased goods, equipment and services; The users purchase good through the purchasing system which has built in controls \boxtimes c.) controls related to contractors and other visitors to the workplace;

oxtimes d.) procedures to cover situations where the absence could lead to deviations from the OH&S policy and the

objectives;

OHSAS 18001 INTERNAL AUDIT OF BNL ORGANIZATIONS FY2008 Attachment 5

| | iteria where their absence could lead t | o deviations from the OSH policy and | the | | | | | |
|---|---|--|---------------------|----------------|-------------|-----------|-------------|--|
| | develop operational controls. They als through the purchase requisition system tion of goods. | | involve | | | | | |
| c. Individuals either go throug With regard to students they f handled and visiting schools) | students are | | | | | | | |
| 2. How do organization OH&S Observed State: Individuals st | | | | | \boxtimes | | | |
| 3. Are relevant procedures and operational controls in place | requirements communicated to the app | propriate suppliers and contractors (a | re | | | | \boxtimes | |
| PROCEDURES AND DOCUMEN CEGPA JRAs | TATION REVIEWED: | | | | | | | |
| Here is the link for the minors who Letter to visitors of the Science Lea Persons Interviewed: R. Backofen, | ringing OEP collaborators in: https://sbms.bnl.gov/sbmsearning center indicating check-in proced S. Bronson, K. Gurski, K. White; D. D. | earch/subjarea/110/110_SA.cfm?parent lure at the gate. | | | | | | |
| For the Science Learning Center, G office area. For general visits, guid | s, Science Undergraduate Laboratory Intal Donoghue indicated that lesson plan les are taught to cover general safety ite ount. Exits, prohibitions on running, ar | for the topics presented are reviewed ms and it is the policy that a guide/instr | and copies are | e kept at | | | | |
| | ride safety information. In the future co with a revision number so that it is kno | | titem to insur | e that the | e instruct | tors cove | r those | |
| Organization: SORD- OMC | | Date: 3/27/2008 | Audit | or: T. M | nugori | | | |
| Element: 4.4.5 | | Title: Control of Documents | Audit | or: T. Maugeri | | | | |
| | | Major | Minor | OFI | Meets | | | |
| document?. Observed State: OMC mainta are reviewed by an SME, revi | we documents for adequacy prior to use ains a project matrix to track a 3 year cy sed as necessary and reviewed by the Q | cle of review and revision to its Polici | es – they Falco. | | | | \boxtimes | |
| | e that changes and the current revision talics, or part of the document that revie ave a section to track changes. | | example: | | | | \boxtimes | |
| 3. Does the organization ensure Observed State: OMC document | e that relevant versions of applicable deents are maintained on OMC's M drive | ocuments are available at points of use with revision numbers associated with | e? them. | | | | \boxtimes | |
| 4. How does the organization en Observed State: They are ma | nsure that documents remain legible an intained on a shared network drive and | nd readily identifiable? are tracked using revision numbers. | | | | | | |
| 5. Are OH&S documents extern Observed State: None know to | nal origin identified and their distributi o exist | ion controlled? | | | | | \boxtimes | |
| 6. How does the organization protection of them if they are retained for a | revent the unintended use of obsolete a any purpose (ie. Stamped "obsolete" or and procedure is in place as per Chapte | r other suitable wording)? | | | | | \boxtimes | |
| PROCEDURES AND DOCUMEN | TATION REVIEWED: Chapter 10 of ynor who is the OMC Medical Records | | | | | | | |
| FINDING: None | ynor who is the Olivie Medical Records | Administrator. | | | | | | |
| Organization: SORD- Human Res | ources | Date: 3/27/2008 | Audit | or: T. M | augeri | | | |
| Element: 4.5.3 | | ations, Nonconformity, Corrective a | | | | | | |
| | Audit question | | | Major | Minor | OFI | Meets | |
| 1. Does the organization use the SBMS)? | eir own procedure(s) for record, invest | igate and analyze incidents? (_X | _rely on | | | | \boxtimes | |

| of in | Is it effective to: a.) determine underlying OH&S deficiencies and other factors that incidents; b.) identify the need for corrective actions; c.) identify opportunities for preventative action; d.) identify opportunities for continual improvement; e.) communicate the results of such investigations. | | ŭ ŭ | occurrence | | | | |
|--|--|--|---|--------------|----------|---------|-----------|-------------|
| 3. | Were investigations performed in a timely manner? (Determine to Observed State: ORPS categorizer notified on 2/9 – (accident was of the severity of the accident | the timing on 1/22) - | g of investigation[s]) - this may have been due to the | change in | | | | \boxtimes |
| 4. | Were corrective actions or opportunities for preventative action d Observed State: Employee counseled by Line Organization. ESH Coordinator reviewed JRA | letermined | 1? | | | | | \boxtimes |
| 5. | How were the results of incident investigation documented and m Observed State: BNL Accident Investigation from filled ou | aintainea | 1? | | | | | \boxtimes |
| 6. | Were risk assessments conducted or revised as a result of inciden Observed State: Review of JRA occurred – no revisions made | ts/events? |) | | | | | \boxtimes |
| 7. | | ocedures i | resulting from corrective and p | reventative | | | | \boxtimes |
| PRO | ROCEDURES AND DOCUMENTATION REVIEWED: Incident Inv | vestigatio | n Report for R. Rinello | | <u> </u> | l | l | |
| | OMMENTS: None | | | | | | | |
| FINI | NDING: None | | | | | | | |
| | | 1 | | | | | | |
| | ganization: SORD- HR/Training/OMC | Е | Date: /27/2008 | Audit | or: T. M | augeri | | |
| Elen | ement: 4.5.4 | Tit | le: Control of Records | | | | | |
| Audit question | | | | | Major | Minor | OFI | Meets |
| Does line organization implement its own procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records? Observed State: OMC – yes, Training – yes, HR – no but under development | | | | | | | | |
| 2. Are organization's OSH records legible, identifiable and traceable? | | | | | | | \square | |
| 3 | Observed State: All - yes Are the records stored and maintained such that they are readi | ily retries | yahla and protected against da | mage | | | | |
| 3. | 3. Are the records stored and maintained such that they are readily retrievable and protected against damage, deterioration or loss? (Evaluate at least three record locations/owners) Observed State: OMC – maintains 2 record rooms in Building 400. Training – maintains records on a computer database HR – maintains paper records. Once a person terminates, the records are scanned and sent to 'Iron | | | | | | | |
| | Mountain.' Maintained in fire proof cabinets. Location: OMC – Building 490 | | | | | | | \boxtimes |
| | Location: HR – Building 400 | | | | | | | |
| | Location: | | | | | H | | |
| PRO | ROCEDURES AND DOCUMENTATION REVIEWED: | | | | Ш | Ш | | Ш |
| OMO | MC – Chapter 10 of Policy Manual | 1 50 | All in a CD a Fa | /O. TO T | | 1 | rr 1 / | |
| | aining – TQ Maintenance and Archiving or Radiological Training Rec | cords, IQ | – Administration of Data Entry | /QA, 1Q – 1r | aining D | atabase | Updates | |
| | NDING: None | | | | | | | |
| | | | 1 | | | | | |
| Orga | ganization: SORD- Information Technology Division | | Date: /24/08 | Audito | or: ML H | einrich | | |
| Elen | ement: 4.3.1 Title: Planning For | Hazard I | dentification, Risk Assessmen | t and Risk C | ontrol | | | |
| | Audit question | | , | | Major | Minor | OFI | Meets |
| 1. | Does the organization use a methodology of documenting risk ass SBMS OHSAS 18001 Program? No Observed State: SBMS Subject Areas and OHSAS are sources for | | | cribed in | | | | |
| 2. | Are the line organizations Risk Assessments up-to-date? Yes Do the and non routine activities; all personnel and all facilities? Observed State: ITD has developed FRA's and JRA's for all hazard Travel was added this year and presented to all staff (employees and | hey cover ds relating nd contrac | current full scope of operation g to the work we do. A JRA for tors) at a Division meeting. | Business | | | | \boxtimes |
| 3. | Have changes occurred in the organization's facilities or operation assessments? Were they up-to-dated to cover the scope of the changes of t | ange? ges in faci | _ | | | | | \boxtimes |

| 4. | d.) signage/warning and/or administrative controls; e.) personal protective equipment) when determining controls within risks assessments and other planning documents? Yes Observed State: Document reviewed: Facility Risk Assessment for ITD Facilities with Computer Centers - FRA-AO-02 Document reviewed: Work Permit # AO-121 Document reviewed: ITD Division Meeting 1/30/2008 Presentation Document reviewed: ITD generated records in BNL Safety Observation Database | | | | |
|----|---|--|---|----------------------|------------------|
| 5. | Are operational controls in place and working as specified? Opportunity for Improvement Observed State: ITD has created guidelines "Procedures and Guidelines for Safely Performing Work in the BCF". This document is read and signed before access to Computing Center is approved. ITD Supervisors on BNL Safety Observation (STOP) observed technician working without hearing protection. Several actions were taken as immediate response for situation. Long-term, new operational controls (a Standard Operating Procedure document and a Web Course) are needed to identify controls for work activities performed in the facility. This work is underway. | | | | |
| 6. | What is the mechanism to inform contractors/interested parties of relevant operational controls applying to them? Observed State: Documents-Email response to Escort for a Vendor Technician coming through Front Gate to perform work on site; Work Permit # AO-121. Contractors receive the same New Employee Training as a new BNL staff person - BNL Web Courses, Classroom General Employee Training (GET) | | | | |
| P | PROCEDURES AND DOCUMENTATION REVIEWED: - ITD's JRAs and FRAs, in particular the FRA for ITD Facilities with Computer Centers and the JRA for Business Tr - Procedures and Guidelines for Safely Performing Work in the Brookhaven Computer Facility - Work Permit # AO-121 | avel, Do | mestic & | & Foreig | 1. |
| F | FRA-AO was recently revised and therefore was evaluated to see how the revisions changed risk in the computer ce Work Permit #AO-121 was reviewed because it showed how ITD uses BNL's Work Permit Process even for low ris ratings. as a way to go through specifics with outside contractors performing work in ITD facilities. This is document Work Permits of what process is being used with vendor technicians to assure operational controls are reaching outsing. ITD is in the process of finalizing a web course for working safely in the BCF. When completed the document "Proceed Safely Performing Work in the Brookhaven Computer Facility will be terminated. Currently cardreader access into given until the document is signed. In the future, cardreader access will not be given until the Web Course is compled. Hearing PPE is one example of controls for risk assessment. It requires immediate response if the actual control will are required of the department. | k, comp ntation f ide contr ocedures the Com ted. | ound am actors. and Gui puter Ce | delines fenters is i | 's for not |
| - | Organization: SORD- Internal Audit & Oversight Office Date: 3/28/08 Auditor: R. C. McN Clement: 4.4.4 Title: Decumentation | Vair IA | &O Ma | nager | |
| E | Audit question | Major | Mino r | OFI | Meets |
| 1. | Does the organization maintain OH&S management system documentation for the following? IA&O does not maintain the OH&S Management System. IA&O complies and follows the requirements in SBMS. | | | | |
| Se | a. Description of the <u>scope</u> of the OH&S management system for its organization (X or does it fit within the SBMS cope) IA&O refers to and complies with the OSH Management System Program Description Manual for the Support Organizations Reporting to the Director's Office. | | | | |
| d | b. Description of the main elements of the OH&S management system and their interactions, and reference to related locuments (X or does it fit with the SBMS Subject Area) (A&O refers to and complies with the SBMS Subject Area. | | | | \boxtimes |
| | Documents & records required by this OHSAS 18001 Standard, such as JRA's Hazard List (IA&O management and staff review, discuss, update and approve the Hazard List and Targets/Objectives.) Risk Assessments | | | | \boxtimes |
| | Objectives | | | | |
| | | | | | |

| | MMENTS: | | | | | | | | |
|---|--|--|----------------------------------|---|----------------------------|----------|------------|----------|-------------|
| FINI | DING: | | | | | | | | |
| | | | 1 | | | | | | |
| Orga | anization: SORD- Internal Au | dit & Oversight Office | | Date: 3/28/08 | Auditor: R. C. N | AcNair, | IA&O | Managei | r |
| Elen | nent: 4.4.5 | Title: Control of Documents | | | | | | | |
| | | Title. Control of Bocuments | | | | | | | |
| Audit question | | | | | | Major | Minor | OFI | Meets |
| | | | | | | • | , | | |
| 1. Does the organization approve documents for adequacy prior to use and review, update as necessary and re-approve document? | | | | | | | П | | |
| Observed State: IA&O Management and staff conduct meetings and discussions to review and update documents. Manager approval is required on all controlled documents. | | | | | | | | | |
| Does the organization ensure that changes and the current revisions status of documents are identified? (example: track changes, margin bars, italics, or part of the document that reviews changes.) | | | | | | | | | |
| | Observed State: - Communic - Revisions | cate the changes verbally are marked on documents (hard o | copies and | l on 'I' Drive | | | | | |
| 3. | Does the organization ensure | that relevant versions of applic | able docu | ments are available at p | points of use? | | | | |
| | controlled. | vs the SBMS Subject Area, Intern | | | A&O Manual is | | | | |
| 4. | | nsure that documents remain legolders identified. Original record | | | iled. "I" drive is also | | | | |
| 5. | | nal origin identified and their dis | stribution | controlled? | | | | | |
| 6. | | revent the unintended use of obs | solete doci | uments and apply suita | ble identification to | | | | |
| | them if they are retained for a Observed State: - The shared | any purpose (ie. Stamped "obsolous") 'I' Drive OHSAS folders are labeled "Obsolete" and are labeled "Obsolete". | <i>lete" or ot</i> eled as "L | ther suitable wording)? egacy" and/or "obsolet | - | | | | \boxtimes |
| PRO | CEDURES AND DOCUMEN | | kept iii 1A | &O Manager's Office. | | | | | |
| _ | | OSH documentation to ensure that | at it was la | abeled correctly | | | | | |
| | cked "I" drive OSH folders. | | | .corou correctly. | | | | | |
| CON | MMENTS: | | | | | | | | |
| | | for Improvement: In the future, | changes v | vill be marked with an a | sterisk and a note will be | nlaced a | t the bott | om of th | e |
| | ment noting the change. | Tot improvement. In the reture, | enunges v | viii oo markee wan an a | sterisk und a note win se | piacea a | | | |
| 0 | | 1:4 ° O:-1-4 Offi | D-4- | .2/20/00 | Alita D. C. MaNa | TA 0 | O M | | |
| _ | nnization: SORD- Internal Au | ait & Oversignt Office | Date | :3/28/08 | Auditor: R. C. McNai | r, IAO | zO Mana | iger | |
| Elen | nent: 4.5.4 | Title: Control of Records | | | | | | | |
| | | | | | | - | - | | - |
| | | Audit question | on | | | Major | Minor | OFI | Meets |
| | | · | | | | or | Or | I | ts |
| 1. | Does line organization imple | ment its own procedure(s) for th | a idantifi | ration storage protecti | on ratriaval ratantion | | | | |
| 1. | and disposal of records? | - | | | on, retrievai, retention | | | | |
| 2. | | ecords Representative follows SE ords legible, identifiable and tr | | rements. | | | | | |
| ۷. | | OSH records are maintained on a | | rive that is backed up by | ITD. | | | | |
| 3. | | naintained such that they are r | | | l against damage, | | | | |
| | | uate at least three record locati | | | 1 : 4h - IA 8-O OFF | | | | \boxtimes |
| | space due to privacy issues (c | e code letter system identifies doc | cumentatio | on in file cabinets locate | d in the IA&O Office | | | | |
| | | Assessment/Business Plan/Tier 1 | | | | | \vdash | П | \boxtimes |
| | | et outside Rm. S-207 (Current) | | | | | ╁╁ | Ħ | |
| | Location: File cabinet Rm. S- | | | | | | | | |
| | Location: | | | | | | | | |
| | CEDURES AND DOCUMEN | | | | | | | _ | |
| | er code system reviewed and up rive OSH folder review | odated to incorporate all file desc | ription typ | es. | | | | | |
| | MMENTS: | | | | | | | | |
| | DING: | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| Organization: Director's Office Date: 3/28/08 Audito | | | | | | | | | |
| Orga | anization: Director's Office | | | Date: 3/28/08 | Audit | or: N. B | ernhole | | |

| | Major | Minor | OFI | Meets | | | |
|--|---|------------|---------|-------|-------------|--|--|
| 1. Does the organizat SBMS OHSAS 186 Observed State: | ion use a methodology of documenting risk assessment and control other than that described in 101 Program ? _x_ No Yes. | | | | | | |
| non routine activiti Observed State: Th | | | | | | | |
| 3. Have changes occur assessments? Were Observed State: Er | urred in the organization's facilities or operations that necessitated a change in the risk e they up-to-dated to cover the scope of the change? upployees of Strategic Planning have been moved to Building 185 from Building 475. The EENS 85 covers these individuals | | | | | | |
| 4. Did the organization d.) signage/warning within risks assession Observed State: | on observe the hierarchy of controls (i.e.: a.) elimination; b.) substitution; c.) engineering controls; g and/or administrative controls; e.) personal protective equipment) when determining controls ments and other planning documents? | | | | \boxtimes | | |
| | ntrols in place and working as specified? | | | | \boxtimes | | |
| 6. What is the mechan | nism to inform contractors/interested parties of relevant operational controls applying to them? sitors are registered in the Guest Information System Database and accompanied by a BNL | | | | | | |
| Strategic Plan | OCUMENTATION REVIEWED: ning/Director's office JRA/FRA tion Tier 1 May 2007. | • | | l | | | |
| COMMENTS: The Tier FINDING: None | 1 inspection will be conducted in the next quarter. The JRA and FRA appear to be adequate at this ti | me. | | | | | |
| FINDING. None | | | | | | | |
| Organization: Legal | Date: 3/28/08 Audi | tor: N. Be | ernholc | | | | |
| Element: 4.3.2 | Title: Legal and other Requirements | | | | | | |
| | | | | | | | |
| | Audit question | Major | Minor | OFI | Meets | | |
| method:x_SBM Within the Legal O | re than one) within the organization designated to keep current on requirements? What is the S SubscriptionOther: ffice, information is sent for distribution through the QM Office if it is a SBMS requirement. | Major | Minor | OFI 🗆 | Meets | | |
| method: _x_SBM Within the Legal O Otherwise, request 2. How are requirement | re than one) within the organization designated to keep current on requirements? What is the S Subscription Other: | | _ | | | | |
| method: _x_SBM Within the Legal O Otherwise, request 2. How are requireme Observed State: The requirements. 3. Does the line organ BNL Subject Matte | re than one) within the organization designated to keep current on requirements? What is the S SubscriptionOther: ffice, information is sent for distribution through the QM Office if it is a SBMS requirement. for interpretation of requirements is addressed on a case-by-case basis through the Legal Office. ents communicated to all interested parties? | | | | | | |
| method: _x_SBM Within the Legal O Otherwise, request 2. How are requiremed Observed State: The requirements. 3. Does the line organ BNL Subject Matteestablished for iden Observed State: 4. If yes to 1, Are the requirements are u | re than one) within the organization designated to keep current on requirements? What is the S SubscriptionOther: ffice, information is sent for distribution through the QM Office if it is a SBMS requirement. for interpretation of requirements is addressed on a case-by-case basis through the Legal Office. ents communicated to all interested parties? the SBMS Requirements Management Office assures that interested parties are informed of legal initiation serve as the SBMS SME, BNL Authority Having Jurisdiction, or otherwise serve as the extra Expert for any OH&S hazard? _x_NoYes: If yes, what procedures have been ntifying and accessing the legal and other OSH requirements that are applicable to BNL. procedures being implemented at a sufficient interval to ensure the legal and other OSH | | | | | | |
| method: _x_SBM Within the Legal O Otherwise, request 2. How are requireme Observed State: The requirements. 3. Does the line organ BNL Subject Matteestablished for iden Observed State: 4. If yes to 1, Are the requirements are u Observed State: The requirements. 5. If yes to #1: What a persons working used observed State: The requirements. With regard to Free (CTTS) subject are indicates that the Letheir own system. | re than one) within the organization designated to keep current on requirements? What is the S SubscriptionOther: ffice, information is sent for distribution through the QM Office if it is a SBMS requirement. for interpretation of requirements is addressed on a case-by-case basis through the Legal Office. ents communicated to all interested parties? The SBMS Requirements Management Office assures that interested parties are informed of legal entitation serve as the SBMS SME, BNL Authority Having Jurisdiction, or otherwise serve as the entitying and accessing the legal and other OSH requirements that are applicable to BNL. The procedures being implemented at a sufficient interval to ensure the legal and other OSH p-to-date? The BBMS Requirements Management Office assures that interested parties are informed of legal enter the mechanism to communicate relevant information on legal and other requirements to ender its control, and other relevant interested parties? The SBMS Requirements Management Offices assures that interested parties are informed of legal endom of Information Act (FOIA) Requests: The Correspondence and Commitment Tracking System a was reviewed. It indicates that FOIA requests be entered into CTTS. A review of the process engal Office is not currently entering FOIA requests into CCTS but instead is tracking these within The Legal Office indicated that they will request a change in the CCTS subject area. | | | | × × | | |
| method: _x_SBM Within the Legal O Otherwise, request 2. How are requireme Observed State: The requirements. 3. Does the line organ BNL Subject Matter established for iden Observed State: 4. If yes to 1, Are the requirements are under the observed State: The requirements. 5. If yes to #1: What to persons working under the observed State: The requirements. With regard to Free (CTTS) subject area indicates that the Legal their own system. PROCEDURES AND DOCOMMENTS: The legal | re than one) within the organization designated to keep current on requirements? What is the S SubscriptionOther: ffice, information is sent for distribution through the QM Office if it is a SBMS requirement. for interpretation of requirements is addressed on a case-by-case basis through the Legal Office. The SBMS Requirements Management Office assures that interested parties are informed of legal inization serve as the SBMS SME, BNL Authority Having Jurisdiction, or otherwise serve as the Expert for any OH&S hazard? _x_NoYes: If yes, what procedures have been natifying and accessing the legal and other OSH requirements that are applicable to BNL. In procedures being implemented at a sufficient interval to ensure the legal and other OSH p-to-date? . The BBMS Requirements Management Office assures that interested parties are informed of legal and other relevant interested parties? The BBMS Requirements Management Office assures that interested parties are informed of legal and other relevant interested parties? The BBMS Requirements Management Offices assures that interested parties are informed of legal and other relevant interested parties? The BBMS Requirements Management Offices assures that interested parties are informed of legal and other relevant interested parties? The Correspondence and Commitment Tracking System as was reviewed. It indicates that FOIA requests be entered into CTTS. A review of the process are all Office is not currently entering FOIA requests into CCTS but instead is tracking these within | | | | | | |
| method: _x_SBM Within the Legal O Otherwise, request 2. How are requireme Observed State: The requirements. 3. Does the line organ BNL Subject Matteestablished for iden Observed State: 4. If yes to 1, Are thee requirements are u Observed State: The requirements. 5. If yes to #1: What to persons working use Observed State: The requirements. With regard to Free (CTTS) subject area indicates that the Letheir own system. PROCEDURES AND DOCOMMENTS: The legal FINDING: | re than one) within the organization designated to keep current on requirements? What is the S SubscriptionOther: ffice, information is sent for distribution through the QM Office if it is a SBMS requirement. for interpretation of requirements is addressed on a case-by-case basis through the Legal Office. Interpretation of requirements is addressed on a case-by-case basis through the Legal Office. Interpretation serve as the SBMS SME, BNL Authority Having Jurisdiction, or otherwise serve as the present for any OH&S hazard? _x_NoYes: If yes, what procedures have been notifying and accessing the legal and other OSH requirements that are applicable to BNL. Interpretation serve as the SBMS SME, BNL Authority Having Jurisdiction, or otherwise serve as the present for any OH&S hazard? _x_NoYes: If yes, what procedures have been notifying and accessing the legal and other OSH requirements that are applicable to BNL. Interpretation of the legal and other OSH requirements that are applicable to BNL. Interpretation of the process are informed of legal and other requirements to inder its control, and other relevant interested parties? In the mechanism to communicate relevant information on legal and other requirements to inder its control, and other relevant interested parties? In the mechanism to communicate relevant information on legal and other requirements to inder its control, and other relevant interested parties? In the mechanism to communicate the correspondence and Commitment Tracking System as was reviewed. It indicates that FOIA requests: The Correspondence and Commitment Tracking System as was reviewed. It indicates that FOIA requests be entered into CTTS. A review of the process regal Office is not currently entering FOIA requests into CCTS but instead is tracking these within the Legal Office indicated that they will request a change in the CCTS subject area. | afety iter | | | | | |
| method: _x_SBM Within the Legal O Otherwise, request 2. How are requireme Observed State: The requirements. 3. Does the line organ BNL Subject Matteestablished for iden Observed State: 4. If yes to 1, Are thee requirements are u Observed State: The requirements. 5. If yes to #1: What to persons working use Observed State: The requirements. With regard to Free (CTTS) subject area indicates that the Letheir own system. PROCEDURES AND DOCOMMENTS: The legal FINDING: | re than one) within the organization designated to keep current on requirements? What is the S SubscriptionOther: ffice, information is sent for distribution through the QM Office if it is a SBMS requirement. for interpretation of requirements is addressed on a case-by-case basis through the Legal Office. Parts communicated to all interested parties? The SBMS Requirements Management Office assures that interested parties are informed of legal initiation serve as the SBMS SME, BNL Authority Having Jurisdiction, or otherwise serve as the parties are informed of legal initiation serve as the SBMS SME, BNL Authority Having Jurisdiction, or otherwise serve as the parties are informed of legal initiation serve as the SBMS Requirements have been intifying and accessing the legal and other OSH requirements that are applicable to BNL. The procedures being implemented at a sufficient interval to ensure the legal and other OSH p-to-date? The SBMS Requirements Management Office assures that interested parties are informed of legal and other relevant interested parties? The SBMS Requirements Management Offices assures that interested parties are informed of legal and other relevant interested parties? The Correspondence and Commitment Tracking System a was reviewed. It indicates that FOIA requests: The Correspondence and Commitment Tracking System as a was reviewed. It indicates that FOIA requests be entered into CTTS. A review of the process gall Office is not currently entering FOIA requests into CCTS but instead is tracking these within The Legal Office indicated that they will request a change in the CCTS subject area. DCUMENTATION REVIEWED: Office may help interpret some of the requirements but the ESH Directorate oversees the day-to-day. | afety iter | | | | | |
| method: _x_SBM Within the Legal O Otherwise, request 2. How are requireme Observed State: The requirements. 3. Does the line organ BNL Subject Matteestablished for iden Observed State: 4. If yes to 1, Are the requirements are used observed State: The requirements. 5. If yes to #1: What a persons working used observed State: The requirements. With regard to Free (CTTS) subject are indicates that the Legal their own system. PROCEDURES AND DOCOMMENTS: The legal FINDING: Evaluate the a | re than one) within the organization designated to keep current on requirements? What is the S SubscriptionOther: Other: Other: | afety iter | ns. | | | | |

| | Audit question | | | Major | Minor | OFI | Meets | |
|--|--|--|--|-------------|--------------|-------------|-------------|--|
| 1. Are organization level Object Objectives were discussed but Is there a documented freque Observed State: The Brookha is posted. Individual Director Office obj | PEMP plan | | | \boxtimes | | | | |
| Individual Director Office objectives were discussed but not formally documented. 2. Are the Objectives measurable, where practicable? Are they consistent with the site level objectives, OH&S policy, including the commitments to the prevention of injury and ill health, to compliance and other requirements to which the organization subscribes, and to continual improvement? Observed State: There are requirements for managers to perform safety observations and enter them in an existing database. | | | | | | | \boxtimes | |
| responsibilities and authority be achieved. | nented a program[s] for achieving its objective of for achieving objectives; and b.) means and the in personnel the action to document and objectives. | time frame by which the object | | | | \boxtimes | | |
| 4. How are objectives made known Observed State: See commen | own to the employee/guests that are supposed to this in 1 and 3 | to achieve them? | | | | \boxtimes | | |
| PROCEDURES AND DOCUMEN Policy & Strategic Planning Websii Brookhaven National Laboratory S Brookhaven National Laboratory A Performance Evaluation and Measu | TATION REVIEWED: te for Institutional plan and performance summ trategic Plan Innual Laboratory Plan FY 2008 | aries. | | | | | | |
| COMMENTS: An individual has been assigned to | address the items. | | | | | | | |
| | or Office objectives were discussed but not form | nally documented. An individu | al is assigned | to addre | ss the ite | ms. | | |
| | | | | | | | | |
| Organization: SORD Date: 03/28/08 Auditor: N. Bernholc | | | | | | | | |
| Organization: SORD | T | Date: 03/28/08 | Audito | or: N. Be | rnholc | | | |
| Organization: SORD Element: 4.4.4 | 7 | Date: 03/28/08 Fitle: Documentation | Audito | or: N. Be | rnholc | | | |
| | Audit question | | Audito | or: N. Be | rnholc Minor | OFI | Meets | |
| I. Does the organization maintadocument/record: OSH mana | | Title: Documentation In for the following? Record to the OSH manual was developed | cation of the | | | OFI | Meets | |
| I. Does the organization mainted document/record: OSH manasite-wide certification. We are document. a. Description of the scope of the | Audit question ain OH&S management system documentation gement documentation is maintained online. The considering eliminating the individual documentation of OH&S management system for its organization | Fitle: Documentation In for the following? Record to the OSH manual was developed the the Sunder | cation of the prior to BMS | Major | Minor | | | |
| 1. Does the organization mainted document/record: OSH manasite-wide certification. We are document. a. Description of the scope of the scope) Fits within the scope of the s | Audit question ain OH&S management system documentation gement documentation is maintained online. The considering eliminating the individual documenter of OH&S management system for its organization of the OH&S management system and the | Title: Documentation In for the following? Record loes the OSH manual was developed the the second pust falling under the Second (or does it fit within the | cation of the prior to BMS SBMS | Major | Minor | | | |
| I. Does the organization mainted document/record: OSH manasite-wide certification. We are document. □ a. Description of the scope of the scope) Fits within the scope of the scope) Fits within the scope of the s | Audit question ain OH&S management system documentation gement documentation is maintained online. The considering eliminating the individual documenter the OH&S management system for its organization to the OH&S management system and the the SBMS Subject Area) by this OHSAS 18001 Standard, such as the department/division by each organizations to have developed objectives independently. Other cussed but not formally documented. 7 Management review was done in November | Title: Documentation In for the following? Record lothe OSH manual was developed then the and just falling under the Station (⊠ or does it fit within the freir interactions, and reference their organizations have decided | cation of the prior to BMS SBMS to related | Major | Minor | | | |
| I. Does the organization mainted document/record: OSH mana site-wide certification. We are document. □ a. Description of the scope of the scope) Fits within the scope of the scope) Fits within the scope of the scope) Fits within the scope of the sco | Audit question ain OH&S management system documentation gement documentation is maintained online. The econsidering eliminating the individual documentation ge OH&S management system for its organizates genets of the OH&S management system and the genets of the OH&S management system and t | Title: Documentation In for the following? Record lothe OSH manual was developed the manual was developed the manual was developed to the state of the within the manual was decided and the minutes finalized. The | cation of the prior to BMS SBMS to related to combine final | Major | Minor | | | |
| I. Does the organization maintadocument/record: OSH manasite-wide certification. We are document. a. Description of the scope of the scope) Fits within the scope of the scope) Fits within the scope of the scope) Fits within the scope of the scope. Occuments (and occuments of the main elem documents (box or does it fit with the c. Documents & records required and provided and pro | Audit question ain OH&S management system documentation gement documentation is maintained online. The considering eliminating the individual document are OH&S management system for its organization SBMS. The system of the OH&S management system and the considering eliminating the individual document system for its organization to the OH&S management system and the considering the OH&S management system for its organization considering the OH&S managemen | Title: Documentation In for the following? Record to the OSH manual was developed then and just falling under the Station (⊠ or does it fit within the their interactions, and reference their organizations have decided and the minutes finalized. The and control of processes that relations. | cation of the prior to BMS Solution Sector related Solution to combine final | Major | Minor | | | |
| I. Does the organization maintadocument/record: OSH manasite-wide certification. We are document. a. Description of the scope of the scope) Fits within the scope of the scope) Fits within the scope of the scope) Fits within the scope of the scope. Of the scope of the scope. The scope of th | Audit question ain OH&S management system documentation gement documentation is maintained online. The considering eliminating the individual document are OH&S management system for its organization SBMS. The system of the OH&S management system and the considering eliminating the individual document system for its organization to the OH&S management system and the considering the OH&S management system for its organization considering the OH&S managemen | Title: Documentation In for the following? Record to the OSH manual was developed then and just falling under the Station (⊠ or does it fit within the their interactions, and reference their organizations have decided and the minutes finalized. The and control of processes that relations. | cation of the prior to BMS Solution Sector related Solution to combine final | Major | Minor | | | |

| Organization: Director's Office /C | IO | Date: 3/28/08 | Audit | or: N,Be | rnholc | | |
|--|---|--|--------------|----------|--------|-----|-------------|
| Element: 4.5.3 | Title: Incident investigations, None | conformity, Corrective and Preventiv | e Action | | | | |
| Audit question 1. Does the organization use their own procedure(s) for record, investigate and analyze incidents? (xrely on SBMS)? | | | | | | OFI | Meets |
| | | | | | | | \boxtimes |
| 2. Is it effective to: NA a.) determine underlying OH& of incidents; b.) identify the need for correc c.) identify opportunities for p d.) identify opportunities for c e.) communicate the results of | 2. Is it effective to: NA \[\square a.\) determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence | | | | | | |
| 3. Were investigations performed in a timely manner? (Determine the timing of investigation[s]) Observed State: No investigations were needed for Counterintelligence and Legal. One accident form was completed by the former Director's office ESH coordinator. | | | | | | | |
| 4. Were corrective actions or o | pportunities for preventative action det determined. It was deemed not applicab | | | | | | |
| 5. How were the results of inci Observed State: A copy is fil | dent investigation documented and ma | uintained? | | | | | |
| 6. Were risk assessments cond | ucted or revised as a result of incidents involved cutting lunch items. This was | | urred during | | | | \boxtimes |
| 7. Did the organization record actions? Observed State: No. | any changes in their documented proc | edures resulting from corrective and p | reventative | | | | |
| Observed State: No. PROCEDURES AND DOCUMENTATION REVIEWED: SBMS Subject areas: Investigation of Incidents, Accidents, and Injuries Injury Management 10 CFR 851 Illness Injury statistics Accident Report COMMENTS: | | | | | | | |
| | have asked to review incident/accident re er food preparation needs to be included | | | | | | |